

Almodovar v. Guevara, et al.
Case No. 18 CV 2341

Negron v. Guevara, et al.
Case No. 18 CV 2701

EXHIBIT 22

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF ILLINOIS
 EASTERN DIVISION

3 ROBERTO ALMODOVAR, JR.,)
)
4 Plaintiff,)
)
5 vs.) No. 18 CV 2341
)
6 REYNALDO GUEVARA, et al.,)
)
7 Defendants.)

-----)
8 WILLIAM NEGRON,)
)
9 Plaintiff,)
)
10 vs.) No. 18 CV 2701
)
11 REYNALDO GUEVARA, et al.,)
)
12 Defendants.)

13
14 The video-recorded deposition of
15 WILLIAM NEGRON, taken pursuant to the Federal Rules
16 of Civil Procedure, before Kathleen A. Hillgard,
17 Certified Shorthand Reporter No. 084-004093, via
18 Zoom, on Monday, September 27, 2021, commencing
19 at 10:07 a.m. pursuant to notice.

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ALSO PRESENT:

Mr. Roberto Almodovar, Jr.

Mr. Juan Ordonez, Legal Videographer

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THE VIDEOGRAPHER: Good morning. We are now

on the video record.

My name is Juan Ordonez. I'm a

videographer in association with Urlaub Bowen &

Associates.

The date is September 27th, 2021, at

the time of 10:05 a.m.

We are present here today remotely

with reference to the case entitled Roberto

Almodovar, Jr. v. Reynaldo Guevara, et al. This

case is filed in the United States District Court,

Northern District of Illinois, Eastern Division,

Case Number 18 CV 2341. The witness is William

Negron.

Will the attorneys please identify

themselves for the record?

MR. ENGQUIST: Josh Engquist on behalf of

defendants Olszewski, Mingey, and Halvorsen.

MR. CARNEY: Theresa Carney on behalf of the

defendant City of Chicago.

MS. McGRATH: Megan McGrath on behalf of

defendant Guevara.

MS. BONJEAN: Jennifer Bonjean on behalf of

plaintiff Roberto Almodovar.

<p style="text-align: right;">Page 6</p> <p>1 MS. HAGY: And Lindsay Hagy on behalf of</p> <p>2 Mr. William Negron.</p> <p>3 MS. BONJEAN: I think it's probably worth</p> <p>4 pointing out that he is a party to this lawsuit</p> <p>5 rather than a witness, which is what the</p> <p>6 videographer just stated. So I don't know if</p> <p>7 anyone --</p> <p>8 MR. ENGQUIST: I was actually -- I was</p> <p>9 actually going to say that, just to be clear for</p> <p>10 the record.</p> <p>11 Mr. Negron is a plaintiff in his own</p> <p>12 lawsuit which is consolidated for the purposes of</p> <p>13 discovery to this case. It's Negron v. The City of</p> <p>14 Chicago, et al., 18 CV 2701.</p> <p>15 THE VIDEOGRAPHER: Sorry about that.</p> <p>16 Will the court reporter please swear</p> <p>17 in the witness.</p> <p>18 (Witness sworn.)</p> <p>19 WILLIAM NEGRON</p> <p>20 called as a witness herein, having been first duly</p> <p>21 sworn, was examined and testified as follows:</p> <p>22 EXAMINATION</p> <p>23 BY MR. ENGQUIST:</p> <p>24 Q. Sir, could you please state your name</p>	<p style="text-align: right;">Page 8</p> <p>1 A. That's fine.</p> <p>2 Q. Okay. Also, you're entitled to a break</p> <p>3 whenever you really want one during this</p> <p>4 deposition. The only thing we ask is that if</p> <p>5 there's a question pending, you answer that</p> <p>6 question before you take a break. All right?</p> <p>7 A. Okay.</p> <p>8 Q. If you don't understand a question, let</p> <p>9 us know, and whoever's asking the questions will do</p> <p>10 their best to rephrase it, repeat it, slow down, or</p> <p>11 whatever we need to do so you understand it. All</p> <p>12 right?</p> <p>13 A. Okay.</p> <p>14 Q. If you don't understand a question,</p> <p>15 just let us know. Okay?</p> <p>16 A. Okay.</p> <p>17 Q. If you answer a question, we're going</p> <p>18 to assume you understood it; is that fair?</p> <p>19 A. It's fair.</p> <p>20 Q. Okay. Also, there'll be times during</p> <p>21 this deposition that you'll probably know exactly</p> <p>22 where I'm going with a question; however, the court</p> <p>23 reporter can really only take down one voice at a</p> <p>24 time. So we really shouldn't -- we really can't</p>
<p style="text-align: right;">Page 7</p> <p>1 and spell your last name for the record.</p> <p>2 A. William Negron, W-i-l-l-i-a-m</p> <p>3 N-e-g-r-o-n.</p> <p>4 Q. And, Mr. Negron, what's your date of</p> <p>5 birth?</p> <p>6 A. November 18, 1976.</p> <p>7 Q. Okay. Mr. Negron, have you ever given</p> <p>8 a deposition before?</p> <p>9 A. No.</p> <p>10 Q. All right. I'm going to go through a</p> <p>11 few of the ground rules just so we're kind of on</p> <p>12 the same page and also just some things to keep in</p> <p>13 mind since we're all doing this via Zoom. Okay?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. First thing, nodding of the</p> <p>16 head, shrugging of the shoulders, saying um-hmm and</p> <p>17 uhn-uhn doesn't come across clear on the record.</p> <p>18 So if you're going to be giving me a yes or no or a</p> <p>19 yes or no to anybody else during questioning, it's</p> <p>20 best that it's just oral and out loud. All right?</p> <p>21 A. Okay.</p> <p>22 Q. Okay. If you don't answer orally, then</p> <p>23 we're probably going to be asking you is that a yes</p> <p>24 or no. Is that okay?</p>	<p style="text-align: right;">Page 9</p> <p>1 speak over each other.</p> <p>2 So if you wait until I'm done asking</p> <p>3 the question before you start answering, that'll</p> <p>4 make it a clearer -- clearer transcript. Okay?</p> <p>5 A. Okay.</p> <p>6 Q. Also, I'll do my best to wait until</p> <p>7 you're done answering before I ask the next</p> <p>8 question. Okay?</p> <p>9 A. Okay.</p> <p>10 Q. Also, I'm assuming there'll be</p> <p>11 objections during -- during this deposition, and</p> <p>12 I don't want to speak for your lawyer, but I know</p> <p>13 for most of the objections you'll be answering</p> <p>14 anyway over the objections. Okay?</p> <p>15 A. Okay.</p> <p>16 Q. Also, you probably want to take a</p> <p>17 little bit of a beat before you answer just so you</p> <p>18 have time for other people to object, just because</p> <p>19 if they start objecting over your testimony it gets</p> <p>20 more and more confusing. All right?</p> <p>21 A. Okay.</p> <p>22 Q. And, once again, the objections are for</p> <p>23 the record only. Okay? Since we don't have a</p> <p>24 judge here. Okay?</p>

<p style="text-align: right;">Page 10</p> <p>1 A. Okay.</p> <p>2 Q. All right. Any questions so far?</p> <p>3 A. No.</p> <p>4 Q. Sir, have you had anything alcoholic to</p> <p>5 drink today?</p> <p>6 A. No.</p> <p>7 Q. Okay. Have you had any kinds of drug,</p> <p>8 either prescription or otherwise, that would affect</p> <p>9 your ability to be able to answer questions today?</p> <p>10 A. No.</p> <p>11 Q. Okay. Where do you currently reside,</p> <p>12 sir?</p> <p>13 A. Currently in Chicago.</p> <p>14 Q. Okay. Can you give me the</p> <p>15 neighborhood, please?</p> <p>16 A. It's close by Norridge. It's on</p> <p>17 Oleander Avenue.</p> <p>18 Q. Oh, okay. You took your mask off.</p> <p>19 Yeah, if you feel -- if you feel more comfortable</p> <p>20 with your mask on, let us know, but apparently you</p> <p>21 feel okay without the mask on now.</p> <p>22 A. Yeah. It's fine without it.</p> <p>23 Q. Okay. Now, prior to this deposition,</p> <p>24 did you review any documents in preparation for the</p>	<p style="text-align: right;">Page 12</p> <p>1 A. No. Just now.</p> <p>2 Q. Okay. Your address there in Norridge,</p> <p>3 do you live with anybody?</p> <p>4 A. Yes. My wife.</p> <p>5 Q. And that was just -- actually, you just</p> <p>6 got married recently; is that correct?</p> <p>7 A. Correct.</p> <p>8 Q. When did you get married?</p> <p>9 A. Friday.</p> <p>10 Q. Friday?</p> <p>11 A. Yeah.</p> <p>12 Q. Congratulations.</p> <p>13 A. Thanks.</p> <p>14 Q. So you had a weekend honeymoon, then</p> <p>15 you're here doing a dep.</p> <p>16 A. Yes.</p> <p>17 Q. Okay. What's your wife's last name?</p> <p>18 A. Cindy Flores.</p> <p>19 Q. And how long have you known Cindy?</p> <p>20 A. Close to two years.</p> <p>21 Q. So did you -- you didn't know her</p> <p>22 before you were released from prison; is that fair</p> <p>23 to say?</p> <p>24 A. Yeah. Yes, it's fair.</p>
<p style="text-align: right;">Page 11</p> <p>1 dep?</p> <p>2 A. Just glanced a few here and there.</p> <p>3 Q. Okay. And when did you glance at a few</p> <p>4 documents here and there?</p> <p>5 A. Not too long ago. Before we started.</p> <p>6 Q. Was it today?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And what documents did you</p> <p>9 glance over?</p> <p>10 A. Those that -- the interrogatories,</p> <p>11 Olszewski's, I can't really pronounce his name, and</p> <p>12 Mingey's.</p> <p>13 Q. Anything else?</p> <p>14 A. No.</p> <p>15 Q. Okay. Did you -- and what you're</p> <p>16 talking about, you're talking about your answer to</p> <p>17 their interrogatories, correct?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Did you meet with anybody prior</p> <p>20 to the deposition in order to prepare for the</p> <p>21 deposition?</p> <p>22 A. No.</p> <p>23 Q. You didn't meet with your lawyer at</p> <p>24 all?</p>	<p style="text-align: right;">Page 13</p> <p>1 Q. Okay. Are you currently employed?</p> <p>2 A. Yes.</p> <p>3 Q. Where?</p> <p>4 A. A company called World Carrier.</p> <p>5 Q. And what do you do for World Carrier?</p> <p>6 A. I'm a delivery driver for them. I</p> <p>7 operate a 26-footer truck.</p> <p>8 Q. Okay. So I'm assuming you have your</p> <p>9 commercial driver's license; is that correct?</p> <p>10 A. Yes. My Class C.</p> <p>11 Q. And how long have you been with World</p> <p>12 Carrier?</p> <p>13 A. Since April this year.</p> <p>14 Q. And have you ever been employed at any</p> <p>15 other place since your release other than World</p> <p>16 Carrier?</p> <p>17 A. Yes. I used to work for UPS. I used</p> <p>18 to work for Everflora when I was first released. I</p> <p>19 used to work for different agencies doing little</p> <p>20 part-time jobs. I've also worked for a -- it was a</p> <p>21 food company. It was called Various -- they were</p> <p>22 kind of having problems with the name, so at the</p> <p>23 end it was like called all day food.</p> <p>24 Q. Okay. What did do you for UPS?</p>

<p style="text-align: right;">Page 14</p> <p>1 A. I was a driver as well.</p> <p>2 Q. And when did you work for UPS? What</p> <p>3 was the range, date range?</p> <p>4 A. It was around 2020 from -- I would say</p> <p>5 from June to maybe September.</p> <p>6 Q. September of?</p> <p>7 A. 2020.</p> <p>8 Q. 2020?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Why did you stop working for UPS</p> <p>11 as a driver in September 2020?</p> <p>12 A. They -- they had a policy which was</p> <p>13 called scratch. And everything else I passed</p> <p>14 except the scratch, which way was based on time.</p> <p>15 You would start, in their definition, like your</p> <p>16 punch-in time at starting deliveries is at</p> <p>17 9:00 a.m. You have 140 packages. You have to be</p> <p>18 done like at 1:06 p.m. or before.</p> <p>19 Q. So, I'm sorry, that scratch policy, was</p> <p>20 that if you didn't meet your work deadlines for</p> <p>21 when you had to be completed, it would count</p> <p>22 against you and you were discharged; is that right?</p> <p>23 MS. BONJEAN: Objection; form, foundation,</p> <p>24 misstates prior testimony.</p>	<p style="text-align: right;">Page 16</p> <p>1 of different restaurants.</p> <p>2 Q. Okay. And what -- what was the</p> <p>3 timeframe of when you worked for All Day Kitchen?</p> <p>4 A. Three months.</p> <p>5 Q. But what were the dates? Do you</p> <p>6 remember the months?</p> <p>7 A. It was around from March of 2021</p> <p>8 through I want to say like late January.</p> <p>9 Q. Oh, so January to March of 2021?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And you had Everflora. When did</p> <p>12 you work for Everflora?</p> <p>13 A. Everflora, I started working for them</p> <p>14 in 2019. That was around in October of 2019. And</p> <p>15 I -- it was a project as well that they were trying</p> <p>16 to expand. I was hired there from an agency. It</p> <p>17 was -- I started from October and ended in December</p> <p>18 of the same year.</p> <p>19 Q. And you were also delivery driver for</p> <p>20 them, correct?</p> <p>21 A. No. During the time I was more of</p> <p>22 production, dealing with production. It was like</p> <p>23 labor job.</p> <p>24 Q. Was that your -- okay. Maybe we should</p>
<p style="text-align: right;">Page 15</p> <p>1 BY MR. ENGQUIST:</p> <p>2 Q. Sir, you can still answer the question.</p> <p>3 A. It was based on, just to clarify, if</p> <p>4 you passed 1:06, that's -- you already basically</p> <p>5 violated their policy, so it was more of a time of</p> <p>6 speed.</p> <p>7 Q. Okay. So you were -- you were</p> <p>8 discharged from there, correct?</p> <p>9 A. Yes.</p> <p>10 Q. And what employment did you have from</p> <p>11 September 2020 until April of this year when you</p> <p>12 came on with World Carrier?</p> <p>13 A. From before, you mean, of World Carrier.</p> <p>14 Q. Well, you have UPS from June of 2020 to</p> <p>15 September of 2020. And I know you've been at World</p> <p>16 Carrier since April of this year. I'm wondering</p> <p>17 what you did in between UPS and World Carrier?</p> <p>18 A. There was a company called All Day</p> <p>19 Kitchen. I worked there for maybe three months.</p> <p>20 It was like a project that they were trying to come</p> <p>21 from California to here and trying to bring the</p> <p>22 business here, which I don't even think it pretty</p> <p>23 much too much survived. It was based on the same</p> <p>24 thing of deliveries to other like food departments</p>	<p style="text-align: right;">Page 17</p> <p>1 try to keep things in order so I don't miss</p> <p>2 something.</p> <p>3 What was your first employment after</p> <p>4 being released from prison?</p> <p>5 A. Everflora.</p> <p>6 Q. Okay. And after Everflora, what was</p> <p>7 next?</p> <p>8 A. After Everflora, I had worked with</p> <p>9 different agencies, so it was like different</p> <p>10 project jobs. Some of them was not -- it wasn't</p> <p>11 titled, like say you would work at a Walmart or</p> <p>12 something. It was different like construction</p> <p>13 companies, they needed assistance, and so they</p> <p>14 would forward me there.</p> <p>15 Q. Okay. And how long did you do these</p> <p>16 project jobs for these different agencies?</p> <p>17 A. It was like different -- different</p> <p>18 jobs or like different months, I'll be called. So</p> <p>19 it'll -- some will vary for like a month, some will</p> <p>20 vary to like two months.</p> <p>21 Q. Do you remember the name of the agency</p> <p>22 or agencies you were getting these jobs through?</p> <p>23 A. It was like Express Employment and</p> <p>24 first one was Upper Deck Staffing.</p>

<p style="text-align: right;">Page 18</p> <p>1 Q. Okay. So Express Employment is an 2 agency that -- for jobs and then Upper Deck is also 3 a staffing job -- staffing agency, correct? 4 A. Correct. 5 Q. Okay. And after the series of project 6 jobs to these different employment agencies, what 7 was the next employment that you had? 8 A. I started -- oh, I thought somebody 9 said something. 10 After that, I started trying to 11 obtain my Class C and went to a company called 12 Morey Milk. 13 Q. What was that again? 14 A. I went to a company called Morey Milk 15 after obtaining my Class C. 16 Q. Morey Milk? 17 A. Yes. 18 Q. Okay. And what did you do for Morey 19 Milk? 20 A. I started my job as a delivery driver. 21 Q. And how long were you a delivery driver 22 for Morey Milk? 23 A. Two months. 24 Q. And why did you leave there?</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Okay. All right. Prior to your 2 incarceration when you were I believe 17, did you 3 have any employment? 4 A. Yes. I used -- in Cook County, I was 5 just basically like a janitorial. They would, you 6 know, just request us if we wanted to work with 7 them pertaining to the sheriff's. So we would just 8 pass out food if we needed to or clean the day 9 room. Anything that needed cloning. 10 Q. That was while you were in custody at 11 the Cook County Jail? 12 A. Correct. 13 Q. Okay. Prior to your being arrested and 14 brought into Cook County Jail, did you have any 15 employment? 16 A. Yes. I worked in the cafeteria 17 department in Stateville, Menard, and in Pontiac. 18 Q. Okay. Putting aside employment that 19 you had while you were in incarcerated, either at 20 Cook County Jail or the Illinois Department of 21 Correction, did you have any other employment 22 before being arrested and incarcerated? 23 A. No. 24 Q. How far did you go in school, sir?</p>
<p style="text-align: right;">Page 19</p> <p>1 A. COVID. 2 Q. And just to be clear, you left because 3 the pandemic basically made your job disappear or 4 you had COVID yourself? 5 A. No. I was informed that my grandmother 6 possibly could have had and contracted COVID, so I 7 informed my boss. He still wanted me to come in 8 regardless. I basically asked the man if I could 9 just get checked because they work under Dean's 10 milk company and I did not want to pass this along, 11 if I did have it. So he just wanted me to come in 12 regardless. 13 Q. Okay. So did you get fired or did you 14 quit because -- over that? 15 A. Basically I quit. 16 Q. And what was after Morey Milk? 17 A. I went to UPS. 18 Q. Okay. So then after UPS, that's where 19 you are now, correct? 20 A. Yes. 21 Q. After UPS? 22 A. Well, yeah. 23 Q. World Carrier? 24 A. Yes.</p>	<p style="text-align: right;">Page 21</p> <p>1 A. Before I got incarcerated? 2 Q. Yes. 3 A. Sophomore. 4 Q. And where were you a sophomore at? 5 A. Roberto Clemente High School. 6 Q. And why did you stop going to school at 7 your sophomore year? 8 A. I was kicked out. 9 Q. I'm sorry. And how old were you 10 were -- when you were a sophomore when you got 11 kicked out of Roberto Clemente? 12 A. Around the age of 14, 15 I'll say. 13 Q. And why were you kicked out? 14 A. Fighting. 15 Q. Was this just one fight which caused 16 you to be expelled or was it a series of fights? 17 A. It was just because of the fight. The 18 principal was trying to I guess put some type of 19 policy that zero exemptions. And so since I was in 20 the middle of a fight, I was just expelled. 21 Q. Okay. Was it just one fight that 22 caused you to get expelled? 23 A. Far as I know, yes. 24 Q. Do you recall the reason for this one</p>

<p style="text-align: right;">Page 22</p> <p>1 fight?</p> <p>2 A. The guy was making fun of another</p> <p>3 gentleman that was in a class with us, how he</p> <p>4 talked. And I just felt like the guy was bullying</p> <p>5 him. So I asked him what was his problem, why is</p> <p>6 he picking on him, and it escalated from there.</p> <p>7 Q. Okay. So it wasn't gang involved at</p> <p>8 all?</p> <p>9 A. No.</p> <p>10 Q. Okay. Did you have any education,</p> <p>11 formal education, after your sophomore year at</p> <p>12 Roberto?</p> <p>13 A. Yes.</p> <p>14 Q. I'm sorry. Putting to one side I know</p> <p>15 you got your commercial driver's license. We</p> <p>16 already talked about that.</p> <p>17 Anything else?</p> <p>18 A. Yes. I got my diploma while I was in</p> <p>19 prison.</p> <p>20 Q. And when did you get your GED?</p> <p>21 A. At around in 2010.</p> <p>22 Q. Okay. Other than your GED in prison,</p> <p>23 any other formal education?</p> <p>24 A. No.</p>	<p style="text-align: right;">Page 24</p> <p>1 A. Little Man.</p> <p>2 Q. Do you remember Little Man's name,</p> <p>3 government name, I guess?</p> <p>4 A. No. I don't no his name like that.</p> <p>5 Q. Okay. And what year was that or what</p> <p>6 was the timeframe in which you were going to --</p> <p>7 where you were deciding whether or not to become a</p> <p>8 YLOD?</p> <p>9 A. It was around -- I would say around the</p> <p>10 time of my freshman year in high school.</p> <p>11 Q. And you said this was -- I guess Little</p> <p>12 Man was the one that was going to initiate you into</p> <p>13 the gang, into the YLODs?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Do you remember what section of</p> <p>16 the YLODs or where he -- where he hung out was?</p> <p>17 A. He was trying to initiate me for an</p> <p>18 area called the -- two streets were Richmond and</p> <p>19 George.</p> <p>20 Q. And where did you live your freshman</p> <p>21 year in high school?</p> <p>22 A. Doing the freshman, if I recall</p> <p>23 correctly, it was living on Fairfield and Augusta.</p> <p>24 Q. Okay. And did you live there the</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. Sir, before your incarceration in 1994,</p> <p>2 before you were arrested in 1994, did you belong to</p> <p>3 a street gang?</p> <p>4 A. Yes. I used to be an Insane Dragon.</p> <p>5 Q. And when did you join the Insane</p> <p>6 Dragons, what age?</p> <p>7 A. It was around I would say maybe 13.</p> <p>8 Q. Did you ever belong to any other gang</p> <p>9 other than the Insane Dragons?</p> <p>10 A. Before the Insane Dragons, I was going</p> <p>11 to be a YLOD.</p> <p>12 Q. Okay. You said you were going to be a</p> <p>13 YLOD. Did you ever become a YLOD?</p> <p>14 A. No.</p> <p>15 Q. And why did you not join the YLODs?</p> <p>16 A. First, a guy that was going to try to</p> <p>17 initiate me, I got jumped by another gang, and he</p> <p>18 ran off and left me there. There was more than one</p> <p>19 factor into it. It was also I didn't really know</p> <p>20 all the YLODs or anything, so I didn't feel like a</p> <p>21 sense of joining a gang that I did not know any</p> <p>22 persons besides him.</p> <p>23 Q. Okay. Who was this person that was</p> <p>24 going to initiate you into the YLODs?</p>	<p style="text-align: right;">Page 25</p> <p>1 entire time that you were in high school your</p> <p>2 freshman and sophomore year?</p> <p>3 A. No. In sophomore more year I was -- my</p> <p>4 mother had -- within around that range, my mother</p> <p>5 decided to move to Kimball and Belle Plaine.</p> <p>6 Q. Kimball and Belle Plaine as a</p> <p>7 sophomore, that's where you moved to?</p> <p>8 A. Yeah. It's around the time within</p> <p>9 freshman and sophomore, but for sure sophomore.</p> <p>10 Q. Okay. Was there a certain gang that</p> <p>11 was more prevalent near the Kimball and Belle</p> <p>12 Plaine address that you lived?</p> <p>13 MS. BONJEAN: Objection; form, foundation.</p> <p>14 MS. HAGY: You can answer.</p> <p>15 THE WITNESS: I believe it was the Simon City</p> <p>16 Royals.</p> <p>17 BY MR. ENGQUIST:</p> <p>18 Q. So you joined the Insane Dragons when</p> <p>19 you were approximately you said 13 years old, your</p> <p>20 sophomore year, correct?</p> <p>21 A. Yes. Around that, yeah.</p> <p>22 Q. All right. Who -- was there to I guess</p> <p>23 initiate you into the Insane Dragons?</p> <p>24 MS. BONJEAN: Objection to the form and</p>

<p style="text-align: right;">Page 26</p> <p>1 foundation of that question.</p> <p>2 MS. HAGY: Join.</p> <p>3 THE WITNESS: The one who initiated me, well,</p> <p>4 I guess I don't really understand the question.</p> <p>5 Like I want to just make sure you ...</p> <p>6 MR. ENGQUIST: Oh, yeah. Sure. I'll -- if</p> <p>7 you don't understand, that's fine. I'll explain</p> <p>8 it.</p> <p>9 BY MR. ENGQUIST:</p> <p>10 Q. Earlier you said that Little Man was</p> <p>11 going to initiate you into the YLODs?</p> <p>12 A. Correct.</p> <p>13 Q. And that's why I was using that term</p> <p>14 when I was talking about the Insane Dragons.</p> <p>15 A. Oh.</p> <p>16 Q. So maybe -- maybe that's -- when you</p> <p>17 said he was -- when you said Little Man was going</p> <p>18 to initiate you into the YLODs, maybe it's best to</p> <p>19 start going backwards a little bit ask: What do</p> <p>20 you mean he was going to initiate?</p> <p>21 A. He was the one that was just basically</p> <p>22 trying to convince me to join the YLODs instead.</p> <p>23 Q. Okay. So he was -- he was recruiting</p> <p>24 you?</p>	<p style="text-align: right;">Page 28</p> <p>1 A. One was Lucky. The other than was</p> <p>2 M-Dog. But that was about it.</p> <p>3 Q. Okay. How long had you known -- or I'm</p> <p>4 sorry.</p> <p>5 When did you first meet Roberto</p> <p>6 Almodovar, Jr.?</p> <p>7 A. I've known Roberto Almodovar, Jr. since</p> <p>8 we were young. To the exact year, I can't really</p> <p>9 say.</p> <p>10 Q. Okay. But when you say "young," I --</p> <p>11 everything's kind of relative. You were 13 when</p> <p>12 you joined the Insane Dragons.</p> <p>13 So when you're talking young, can</p> <p>14 you give me an idea of what you mean by young?</p> <p>15 A. It could have been before the age</p> <p>16 of 13, of course. That's what I mean. I'm --</p> <p>17 maybe just ballpark, I could have been like maybe</p> <p>18 11 -- I mean, sorry, about 12. It could have been</p> <p>19 11. Can't really say.</p> <p>20 Q. Okay. And how did you first come to</p> <p>21 meet Roberto Almodovar, Jr.?</p> <p>22 A. I believe it was we lived around close</p> <p>23 by the same area.</p> <p>24 Q. And when you say, you know, he</p>
<p style="text-align: right;">Page 27</p> <p>1 A. Yes.</p> <p>2 Q. Okay.</p> <p>3 A. Yeah.</p> <p>4 Q. All right. So when you talked about</p> <p>5 him initiating you, you were talking about him</p> <p>6 recruiting you; is that --</p> <p>7 A. Yeah, correct.</p> <p>8 Q. -- fair to say?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. So who recruited you into the</p> <p>11 Insane Dragons?</p> <p>12 MS. HAGY: Objection; form, foundation.</p> <p>13 MS. BONJEAN: Join.</p> <p>14 THE WITNESS: The one who initiated me --</p> <p>15 there was different guys that had got me in, but</p> <p>16 the one who basically initiated me was Roberto</p> <p>17 Almodovar, Jr.</p> <p>18 BY MR. ENGQUIST:</p> <p>19 Q. And you said there were other people as</p> <p>20 well?</p> <p>21 A. Yeah. There was other people, but I</p> <p>22 really didn't know them.</p> <p>23 Q. Okay. Do you remember any of their</p> <p>24 names or even nicknames?</p>	<p style="text-align: right;">Page 29</p> <p>1 initiated you, and you talked about before that</p> <p>2 being recruitment, what kind of things were done to</p> <p>3 help recruit you into the Insane Dragons?</p> <p>4 A. I don't understand. Like what, filing</p> <p>5 an application or something? I don't understand.</p> <p>6 Q. Well, I doubt if there was a written</p> <p>7 application.</p> <p>8 A. Yeah.</p> <p>9 Q. Am I right on that?</p> <p>10 A. Yeah, correct.</p> <p>11 Q. Okay.</p> <p>12 A. I just wanted to be clear.</p> <p>13 Q. Well, earlier you were talking about</p> <p>14 Little Man and then you didn't feel basically too</p> <p>15 safe with Little Man because he didn't have your</p> <p>16 back during a fight when you were jumped.</p> <p>17 A. Correct.</p> <p>18 Q. So I'm wondering what type of things</p> <p>19 were either promised or told to you that helped</p> <p>20 initiate you into the Insane Dragons?</p> <p>21 MS. HAGY: Objection; form, foundation.</p> <p>22 You can answer.</p> <p>23 MS. BONJEAN: I'm going to. I'm sorry.</p> <p>24 Joint that objection. I -- I don't know what it</p>

<p style="text-align: right;">Page 30</p> <p>1 means, but go ahead.</p> <p>2 THE WITNESS: I just -- after when I was</p> <p>3 about to join, they just -- we just talked. And</p> <p>4 since a lot of them I -- I kind of grew up with</p> <p>5 them, I was just like what they call a walk-in.</p> <p>6 BY MR. ENGQUIST:</p> <p>7 Q. And what does that mean to be a</p> <p>8 walk-in?</p> <p>9 A. I'm assuming no physical harm.</p> <p>10 Q. So you weren't violated into the gang?</p> <p>11 A. Correct.</p> <p>12 Q. Did you have any other family members</p> <p>13 that were members of the Insane Dragons at that</p> <p>14 time?</p> <p>15 A. No.</p> <p>16 Q. Do you know if Roberto had other family</p> <p>17 members that were members of the Insane Dragons?</p> <p>18 MS. BONJEAN: Objection; form, foundation.</p> <p>19 MS. HAGY: Join.</p> <p>20 THE WITNESS: I believe some of his cousins</p> <p>21 were.</p> <p>22 BY MR. ENGQUIST:</p> <p>23 Q. Was -- do you remember a cousin named</p> <p>24 Sergio?</p>	<p style="text-align: right;">Page 32</p> <p>1 BY MR. ENGQUIST:</p> <p>2 Q. Do you know if Roberto Almodovar, Jr.</p> <p>3 had any rank with the Insane Dragons?</p> <p>4 MS. BONJEAN: Objection; form, foundation.</p> <p>5 MS. HAGY: Join.</p> <p>6 THE WITNESS: No.</p> <p>7 BY MR. ENGQUIST:</p> <p>8 Q. You don't know?</p> <p>9 A. No, I don't.</p> <p>10 Q. Was there a certain section with the --</p> <p>11 of the Insane Dragons that you were a part of?</p> <p>12 MS. HAGY: Objection, form.</p> <p>13 MS. BONJEAN: Foundation.</p> <p>14 MS. HAGY: Join.</p> <p>15 THE WITNESS: I was -- during the time I was</p> <p>16 from -- I first started on Belden and Normandy.</p> <p>17 BY MR. ENGQUIST:</p> <p>18 Q. And who else were members out there or</p> <p>19 part of that section at Belden and Normandy?</p> <p>20 A. Say again.</p> <p>21 Q. Who else were members of the Insane</p> <p>22 Dragons at that section at Belden or Normandy?</p> <p>23 MS. HAGY: Objection; form, foundation.</p> <p>24 MS. BONJEAN: Joint.</p>
<p style="text-align: right;">Page 31</p> <p>1 A. Yes.</p> <p>2 Q. Was he a member of the Insane Dragons?</p> <p>3 A. During the time when I turned, yes.</p> <p>4 Q. Do you remember another member</p> <p>5 Mr. Almodovar's family by the name of Edwin?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. I believe his nickname was</p> <p>8 Little E back then; is that correct?</p> <p>9 A. Yeah, I believe so.</p> <p>10 Q. Okay. Was he a member of the Insane</p> <p>11 Dragons?</p> <p>12 A. Back then, yes.</p> <p>13 Q. Did Edwin have any rank within the</p> <p>14 Insane Dragons, if you know?</p> <p>15 MS. BONJEAN: Objection; form, foundation.</p> <p>16 MS. HAGY: Join.</p> <p>17 THE WITNESS: No, I don't -- I don't know.</p> <p>18 BY MR. ENGQUIST:</p> <p>19 Q. Did you ever have any rank within the</p> <p>20 Insane Dragons?</p> <p>21 MS. BONJEAN: Same objections.</p> <p>22 MS. HAGY: Join.</p> <p>23 THE WITNESS: No.</p> <p>24</p>	<p style="text-align: right;">Page 33</p> <p>1 THE WITNESS: During that time, it was --</p> <p>2 when I first turned, it was Roberto Almodovar and</p> <p>3 then it was Sergio.</p> <p>4 BY MR. ENGQUIST:</p> <p>5 Q. Do you remember the Hassem brothers,</p> <p>6 Dean Hassem and Nurudeen Hassem?</p> <p>7 A. I believe we called him Dean, if that's</p> <p>8 the same guy.</p> <p>9 Q. Okay. Was he also a member up there?</p> <p>10 A. The -- yeah.</p> <p>11 Q. You said you start off at Belden and</p> <p>12 Normandy.</p> <p>13 Did you move to a different section</p> <p>14 later on within the Insane Dragons?</p> <p>15 A. Yes. I was the moved to Fairfield and</p> <p>16 Augusta.</p> <p>17 Q. And why is that?</p> <p>18 A. I couldn't really get to the commute.</p> <p>19 Q. How long were you -- did you consider</p> <p>20 yourself a member of the section of Insane Dragons</p> <p>21 at Belden and Normandy?</p> <p>22 A. It wasn't long. It was a matter of</p> <p>23 months. I really can't say if it could have been</p> <p>24 six months or three months.</p>

<p style="text-align: right;">Page 34</p> <p>1 Q. After you moved to the different 2 section at Fairfield and Augusta of the Insane 3 Dragons, did you still have contact with other 4 members of the Belden or Normandy section? 5 A. Yes, whenever they came and drove by. 6 Q. Do you remember who the -- I guess the 7 leader of your section was when you -- at Fairfield 8 and Augusta? 9 MS. HAGY: Objection; form, foundation. 10 MS. BONJEAN: Join. 11 THE WITNESS: No. Somebody of my age, I 12 doubt it that they would reveal something like that 13 being that I was, you know, just an adolescent. 14 BY MR. ENGQUIST: 15 Q. Okay. And who was in charge of the 16 section at Belden and Normandy? 17 A. I don't even know, to be honest. 18 MS. BONJEAN: Objection. 19 MS. HAGY: Join. 20 MS. BONJEAN: Same objection. 21 BY MR. ENGQUIST: 22 Q. Do you remember an Insane Dragon by the 23 name -- with the nickname Woody? 24 MS. HAGY: Objection; form, foundation.</p>	<p style="text-align: right;">Page 36</p> <p>1 A. I started having problems with some of 2 the -- the gang members, I guess, from my area. 3 Q. And do you remember when in 1994 you 4 started having problems with the gang members in 5 your area? 6 A. When they stopped? 7 Q. No. When did -- do you remember when 8 that started, when you started having these 9 problems with the gang members in your area? 10 A. I would say around in June of '94. 11 Q. Okay. So when did you -- in what month 12 in 1994 do you believe you stopped being a member 13 of the Insane Dragons? 14 A. I would say around August of '94. 15 Q. When you stopped being a member of the 16 Insane Dragons in August of 1994, did you have to 17 notify anybody? Did you have to do anything in 18 order to stop being a member? 19 A. I believe my grandfather was involved 20 in it. He knew a guy by the name of Abel. He 21 talked to him. And Abel had discussed it with a 22 few people, I guess. And he just said, Here, 23 you're -- you're officially out. 24 Q. Okay. And -- all right. What was your</p>
<p style="text-align: right;">Page 35</p> <p>1 MS. BONJEAN: Same. 2 THE WITNESS: Yeah. I know who's Woody. 3 BY MR. ENGQUIST: 4 Q. And do you know Woody's real name or 5 given name? 6 A. I believe it's Leandro or something 7 like that. 8 Q. Okay. Leondro Marin or Leondro Marin 9 Maysonet Maria, does that ring a bell? 10 A. No. I just know him by Leandro if 11 anything. 12 Q. Okay. And what section was Leandro a 13 member of the Insane Dragons? 14 MS. HAGY: Objection; form, foundation. 15 MS. BONJEAN: Join. 16 THE WITNESS: I really don't know. 17 BY MR. ENGQUIST: 18 Q. Were you friends with Leandro? 19 A. We weren't really that tight like that. 20 Q. Okay. So from the age of 13 until 21 you -- well, actually, when did you stop being a 22 member of the Insane Dragons? 23 A. In 1994. 24 Q. And why did you stop in 1994?</p>	<p style="text-align: right;">Page 37</p> <p>1 grandfather's name? 2 A. Hilario. 3 Q. Is it also Negron? 4 A. No. It's Ortiz. 5 Q. Was Hilario a member of the Insane 6 Dragons? 7 A. No. My grandfather's never been 8 affiliated. 9 Q. Okay. How did your father know to talk 10 to able in order to get you out of the Insane 11 Dragons? 12 MS. HAGY: Objection; form, foundation. 13 THE WITNESS: It wasn't my father. It was my 14 grandfather. 15 BY MR. ENGQUIST: 16 Q. I'm sorry. Your grandfather? 17 A. He -- I guess he knew him from around 18 the area of -- of, you know, just I guess talking 19 to people. 20 Q. So had you had a previous conversation 21 with your grandfather Hilario about getting out? 22 A. Yes. 23 Q. Okay. Sorry. I had to close 24 something. I had too many things open on my</p>

<p style="text-align: right;">Page 38</p> <p>1 screen.</p> <p>2 What kind of problems were you</p> <p>3 having with your fellow gang members?</p> <p>4 A. That was dealing with something dealing</p> <p>5 with my brother. My brother was -- I don't know</p> <p>6 what he was doing, but it was involving with him</p> <p>7 until threats were made to my grandparents. And</p> <p>8 that's when everything took a whole different toll.</p> <p>9 Q. And what was -- was your brother a</p> <p>10 member of the Insane Dragons?</p> <p>11 A. No. My brother's never been</p> <p>12 affiliated. I really don't know what really</p> <p>13 happened with the whole deal pertaining to my</p> <p>14 brother. My grandfather was really worked up about</p> <p>15 it, but he was more like angry at me because these</p> <p>16 were the same guys that I was affiliated or, you</p> <p>17 know, back then associating with. So that's what</p> <p>18 took a whole toll of me just getting on out,</p> <p>19 especially when it was threats being made to my</p> <p>20 grandparents of moving and et cetera.</p> <p>21 Q. Okay. And what kind of -- you said</p> <p>22 threats were being made. Were threats being made</p> <p>23 to your grandparents by members of the Insane</p> <p>24 Dragons?</p>	<p style="text-align: right;">Page 40</p> <p>1 Q. Well, did you ever talk to him back in</p> <p>2 1994, your brother, about it in 1994 about what was</p> <p>3 going on?</p> <p>4 A. No. My brother and I, we weren't</p> <p>5 really as tight back then.</p> <p>6 Q. Where did you live back in -- back in</p> <p>7 June of 1994?</p> <p>8 A. In Belle Plaine.</p> <p>9 Q. And did you live there all the way up</p> <p>10 until the time of your arrest?</p> <p>11 A. Yes.</p> <p>12 Q. And who did you live with -- I'm sorry.</p> <p>13 Let me start -- was it a house or an apartment?</p> <p>14 A. It was an apartment.</p> <p>15 Q. And who did you live with?</p> <p>16 A. My mother, Sara Ortiz.</p> <p>17 Q. Anyone else?</p> <p>18 A. No.</p> <p>19 Q. And where did your brother live?</p> <p>20 A. My brother was staying with my</p> <p>21 grandparents during the time.</p> <p>22 Q. And where did they live?</p> <p>23 A. On Rockwell and Augusta.</p> <p>24 Q. Do you know an Antonio Guzman?</p>
<p style="text-align: right;">Page 39</p> <p>1 A. According to my grandfather, yes. He</p> <p>2 just didn't want to say from whom, but he just</p> <p>3 said, It was your friends, your guys. And that's</p> <p>4 what made everything of the whole transformation</p> <p>5 for me.</p> <p>6 Q. Did you ever talk to your fellow</p> <p>7 members of the Insane Dragons to find out what was</p> <p>8 going on with them and your brother and your</p> <p>9 grandparents?</p> <p>10 MS. HAGY: Objection, vague.</p> <p>11 THE WITNESS: Yeah. I tried to ask a few</p> <p>12 people, but some of them just didn't want to get</p> <p>13 involved; some of them were just -- they just --</p> <p>14 they really didn't know what was going on. So I</p> <p>15 was just in the dark.</p> <p>16 BY MR. ENGQUIST:</p> <p>17 Q. Have you ever talked to your brother</p> <p>18 about why this -- this tension started between your</p> <p>19 gang and him in 1994?</p> <p>20 A. No. I really never asked him about it</p> <p>21 since, you know, while being in prison, you know,</p> <p>22 my grandfather passed away and all that. So I</p> <p>23 really just didn't want to surface any type of</p> <p>24 old -- old news.</p>	<p style="text-align: right;">Page 41</p> <p>1 A. Yes.</p> <p>2 Q. And who's Antonio Guzman?</p> <p>3 A. Antonio Guzman was a guy that I met</p> <p>4 while in -- incarcerated in Cook County Jail.</p> <p>5 Q. Do you know if he belonged to a gang?</p> <p>6 A. The last I know, it was Spanish Cobras.</p> <p>7 Q. Have you kept in touch with Antonio</p> <p>8 Guzman?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And where is he now?</p> <p>11 A. I really don't know where he lives at,</p> <p>12 but we just communicate through phone, if anything,</p> <p>13 like text messages, or if not he'll call me, or</p> <p>14 through messenger.</p> <p>15 Q. Did Antonio -- did you spend time with</p> <p>16 Antonio Guzman while you were incarcerated within</p> <p>17 the Illinois Department of Corrections?</p> <p>18 A. Correct.</p> <p>19 Q. Okay. And where did you know him -- or</p> <p>20 I'm sorry. Which -- which facility was that?</p> <p>21 A. Division 9 in Cook County Jail, 3A, to</p> <p>22 be precise.</p> <p>23 Q. Okay. After Division 9, Cook County</p> <p>24 Jail, how did you keep in touch with him after that</p>

<p style="text-align: right;">Page 42</p> <p>1 point?</p> <p>2 A. He reached out to me through messenger</p> <p>3 when I was released.</p> <p>4 Q. When you're saying "messenger," is that</p> <p>5 the -- the associated app with Facebook?</p> <p>6 A. Correct.</p> <p>7 Q. Would you consider Antonio Guzman a</p> <p>8 friend?</p> <p>9 A. Yes.</p> <p>10 Q. Did you keep in touch with him at all</p> <p>11 while you were incarcerated within Cook -- within</p> <p>12 the Illinois Department of Corrections?</p> <p>13 A. No.</p> <p>14 Q. Now, sir, you were convicted of two</p> <p>15 different murders, correct?</p> <p>16 A. Correct.</p> <p>17 Q. Okay. And we'll talk about your --</p> <p>18 your arrest in this case, but you -- you were</p> <p>19 involved in another murder that took place before</p> <p>20 the murder of -- the shooting of Jacqueline Grande</p> <p>21 and the murder of her friend; is that correct?</p> <p>22 MS. HAGY: Objection; form, foundation.</p> <p>23 THE WITNESS: Yeah. I was -- I was charged</p> <p>24 for an unrelated murder.</p>	<p style="text-align: right;">Page 44</p> <p>1 Q. Were you present when Antonio Baez was</p> <p>2 killed?</p> <p>3 MS. HAGY: Objection; form, foundation.</p> <p>4 THE WITNESS: No.</p> <p>5 MR. ENGQUIST: I'm sorry. Going to pull up</p> <p>6 some documents here.</p> <p>7 BY MR. ENGQUIST:</p> <p>8 Q. Do you know Miquel Serrano is?</p> <p>9 A. No.</p> <p>10 MR. ENGQUIST: Okay. Lindsay, we sent over</p> <p>11 exhibits earlier. I don't know -- did you have a</p> <p>12 chance to print them out or not or should I be</p> <p>13 sharing the screen?</p> <p>14 MS. HAGY: I was trying to get my paralegal</p> <p>15 to print them out. I don't know that that has</p> <p>16 happened yet.</p> <p>17 MR. ENGQUIST: Do you --</p> <p>18 MS. HAGY: So --</p> <p>19 MR. ENGQUIST: Do you happen to have the</p> <p>20 court reported statement of your client having to</p> <p>21 do with the Baez murder?</p> <p>22 MS. HAGY: I might not have my hands on it</p> <p>23 right now. I -- if you want to take break, I can</p> <p>24 go print everything. We just -- I didn't have time</p>
<p style="text-align: right;">Page 43</p> <p>1 BY MR. ENGQUIST:</p> <p>2 Q. Okay. And that was a Mr. Baez; is that</p> <p>3 correct?</p> <p>4 A. Yeah, Antonio Baez.</p> <p>5 Q. And did you know Antonio Baez?</p> <p>6 A. No.</p> <p>7 Q. Do you know what gang Antonio Baez</p> <p>8 belonged to at the time of his death?</p> <p>9 MS. HAGY: Objection; form, foundation.</p> <p>10 THE WITNESS: The only thing it was -- what</p> <p>11 I've heard, he was a retired Insane Dragon.</p> <p>12 BY MR. ENGQUIST:</p> <p>13 Q. Now, if I remember correctly, you don't</p> <p>14 contest the fact that you committed that murder,</p> <p>15 correct?</p> <p>16 MS. HAGY: Objection; form, foundation.</p> <p>17 THE WITNESS: Say again. I don't contest?</p> <p>18 BY MR. ENGQUIST:</p> <p>19 Q. Yeah.</p> <p>20 Did you murder Antonio Baez?</p> <p>21 A. No.</p> <p>22 Q. Are you saying that you're also</p> <p>23 innocent of that crime?</p> <p>24 A. Correct.</p>	<p style="text-align: right;">Page 45</p> <p>1 to print it myself.</p> <p>2 MR. ENGQUIST: No, that's -- that's</p> <p>3 absolutely fine. Why don't we just take like a --</p> <p>4 how long do you think you want? Ten minutes, five</p> <p>5 minutes, what do you think?</p> <p>6 MS. HAGY: Ten minutes, I -- I should be able</p> <p>7 to get it.</p> <p>8 MR. ENGQUIST: Ten minutes. That's great.</p> <p>9 Why don't we go off the record and</p> <p>10 come back at ten after 11:00.</p> <p>11 THE VIDEOGRAPHER: We're off the record at</p> <p>12 11:01.</p> <p>13 (Recess taken.)</p> <p>14 THE VIDEOGRAPHER: We're back on the record.</p> <p>15 Time is 11:16 a.m.</p> <p>16 BY MR. ENGQUIST:</p> <p>17 Q. Okay, sir. We took a break. And I</p> <p>18 know your attorney printed out the copy of the</p> <p>19 court reported statement, and I believe, just for</p> <p>20 record, CCSA -- you have to look at the number at</p> <p>21 the bottom, it's CCSAO 00235 all the way to</p> <p>22 00SAO -- I'm sorry, CCSAO 00254. Is that correct?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Why don't we have that marked as</p>

<p style="text-align: right;">Page 46</p> <p>1 Exhibit Number 1.</p> <p>2 Sir, have you ever seen this before?</p> <p>3 A. No, not like this.</p> <p>4 Q. Okay. Did you see it in a different</p> <p>5 format other than what -- like this?</p> <p>6 A. Yes. It was a -- like a -- like</p> <p>7 handwritten or something. It was something like</p> <p>8 that.</p> <p>9 Q. Okay. You don't recall ever viewing it</p> <p>10 typed up as a court reported statement before?</p> <p>11 A. Not that I recall.</p> <p>12 Q. Okay. Well, let's look at the very</p> <p>13 first page on the bottom. In the middle of that,</p> <p>14 there's some handwriting on the bottom.</p> <p>15 Is that your -- is that your</p> <p>16 signature, sir?</p> <p>17 A. Yeah. It looks like it.</p> <p>18 Q. Okay. And if we go to the next page,</p> <p>19 page 2, is that also your signature?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Why don't you go through. I --</p> <p>22 and I believe your signature's on all the pages on</p> <p>23 the bottom. If you can take a quick peek and let</p> <p>24 me know if those are -- if that's all your</p>	<p style="text-align: right;">Page 48</p> <p>1 that in this -- this statement that was given on</p> <p>2 September 20th, 1994, to Assistant State's Attorney</p> <p>3 John O'Grady and a detective from Area 4 by the</p> <p>4 name of Thomas O'Grady that you admitted to being</p> <p>5 involved in the shooting and murder of Mr. Baez?</p> <p>6 MS. HAGY: Objection; form, foundation.</p> <p>7 THE WITNESS: Yes. This was according to</p> <p>8 them, yes.</p> <p>9 BY MR. ENGQUIST:</p> <p>10 Q. Okay. Did you actually tell them that</p> <p>11 or is this all made up?</p> <p>12 A. A lot of it is -- is basically made up.</p> <p>13 I believe it was just fabricated. They would ask</p> <p>14 me questions in regards to if I was upset what</p> <p>15 occurred out there. And I said, yeah, naturally,</p> <p>16 of course, you know, something like this, yeah, I</p> <p>17 was upset. They were bringing up like another</p> <p>18 crime pertaining to another fellow they said Dragon</p> <p>19 Alfredo, if I was upset at that. And I said I knew</p> <p>20 him, but not as much, but yeah, I was -- you know,</p> <p>21 I was kind of upset.</p> <p>22 But I believe a lot of this was</p> <p>23 fabricated. Being that I was young, they just</p> <p>24 said, you know, if you just sign here, then you're</p>
<p style="text-align: right;">Page 47</p> <p>1 signatures, if that's your signature on all of</p> <p>2 them.</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And on the very last page, it</p> <p>5 also has -- it has -- your signature's in two</p> <p>6 different spots, correct?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Do you recall signing this, sir,</p> <p>9 back on September 20th, 1994?</p> <p>10 A. No. I remember like it was like</p> <p>11 handwritten, if I was -- if I'm correct.</p> <p>12 Q. Okay. Do you think someone put your</p> <p>13 signature on these typed pages at some point</p> <p>14 afterwards?</p> <p>15 A. Maybe, possibly. I don't know.</p> <p>16 Q. Okay. Are you aware that this -- this</p> <p>17 document right here was actually used during your</p> <p>18 criminal trial having to do with the murder of</p> <p>19 Antonio Baez?</p> <p>20 A. Yes. I knew it was a statement that</p> <p>21 was used against in the trial, but I've never seen</p> <p>22 it like this. It was -- to my recollection, it was</p> <p>23 never brought up to me, if I'm correct.</p> <p>24 Q. Okay. Sir, have -- are you familiar</p>	<p style="text-align: right;">Page 49</p> <p>1 good to go. I really didn't see what was being</p> <p>2 written or anything. I didn't know any of the</p> <p>3 process. I was about -- frequently about a week</p> <p>4 later after being charged for -- for the -- in</p> <p>5 regards to the Guevara, I was being called to this.</p> <p>6 So I was just like at a total -- blown away by</p> <p>7 everything and just after one thing after another</p> <p>8 thing just happening. But a lot of this, no, I</p> <p>9 really don't know too much about all of this, just,</p> <p>10 you know, what's -- what was said in court.</p> <p>11 Q. Okay. Sir, do you realize that this</p> <p>12 transcript here purport to be a typed up transcript</p> <p>13 by a court reporter by the name of Cordelia Busse</p> <p>14 Wert, first page.</p> <p>15 A. Oh, yes. I see it now.</p> <p>16 Q. Okay. And, sir, do you recall when you</p> <p>17 were speaking to the assistant state's attorney</p> <p>18 regarding the murder of Mr. Baez that there was a</p> <p>19 person in the room who was typing up things as</p> <p>20 people were speaking?</p> <p>21 A. No. I don't recall anybody in the room</p> <p>22 besides just me and the two individuals that were</p> <p>23 brothers.</p> <p>24 Q. Who's Dino?</p>

<p style="text-align: right;">Page 50</p> <p>1 A. I don't know who's Dino.</p> <p>2 Q. Pedro Dungerea?</p> <p>3 A. Oh, Dino.</p> <p>4 Q. Yeah.</p> <p>5 A. He was the co-defendant for that case.</p> <p>6 Q. Okay. Was he also a member of the</p> <p>7 Insane Dragons?</p> <p>8 MS. HAGY: Objection; form, foundation.</p> <p>9 THE WITNESS: During the time, yes.</p> <p>10 BY MR. ENGQUIST:</p> <p>11 Q. Okay. Were you friends with him?</p> <p>12 A. Not -- not as tight.</p> <p>13 Q. Okay. Did you ever hang out with him?</p> <p>14 A. A few times.</p> <p>15 Q. Okay. And what was your nickname, sir,</p> <p>16 when you were in the Insane Dragons?</p> <p>17 A. Snoopy.</p> <p>18 Q. Okay. Did you get that nickname from</p> <p>19 the gang or did you have it beforehand?</p> <p>20 A. No. From the gang.</p> <p>21 Q. Okay. Do you still go by Snoopy?</p> <p>22 A. No.</p> <p>23 Q. Okay. Do you remember a friend of</p> <p>24 yours by the name of Tony who lived at Washtenaw</p>	<p style="text-align: right;">Page 52</p> <p>1 A. No. I didn't really know him like</p> <p>2 that. If anything, I might have seen him here and</p> <p>3 there, but I didn't socialize with him.</p> <p>4 Q. Okay. Was he an Insane Dragon?</p> <p>5 A. As far as what I recall, yeah. Well,</p> <p>6 what I heard.</p> <p>7 Q. Okay. Sir, did you ever handle a gun</p> <p>8 while you were a member of the Insane Dragons?</p> <p>9 MS. HAGY: Objection, vague.</p> <p>10 MS. BONJEAN: Objection; form, foundation.</p> <p>11 THE WITNESS: No. I've never held a gun as</p> <p>12 far as when I was a Dragon. If anything, it'd be a</p> <p>13 bat or something like that if something ever</p> <p>14 happens or physical.</p> <p>15 BY MR. ENGQUIST:</p> <p>16 Q. Okay. So in this transcript, in this</p> <p>17 court reported statement, where you indicate that</p> <p>18 you had a 9 millimeter that was given to you to</p> <p>19 hold, that would be -- that would be false. Is</p> <p>20 that what you're saying?</p> <p>21 A. Yes.</p> <p>22 Q. Who's Baby Shark?</p> <p>23 A. Far as I know, he's a Dragon.</p> <p>24 Q. Okay. Was he a friend of yours?</p>
<p style="text-align: right;">Page 51</p> <p>1 and Walton?</p> <p>2 MS. HAGY: Objection; form, foundation.</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MR. ENGQUIST:</p> <p>5 Q. Okay. Do you remember Tony's last</p> <p>6 name?</p> <p>7 A. If I'm correct, it's Gonzales, but I'm</p> <p>8 not really sure.</p> <p>9 Q. Okay.</p> <p>10 A. To be honest.</p> <p>11 Q. Did Tony have a nickname?</p> <p>12 A. Casper.</p> <p>13 Q. Okay. Was he also a member of the</p> <p>14 Insane Dragons?</p> <p>15 A. No. He was -- during the time, I</p> <p>16 believe he was an Insane Campell Boy.</p> <p>17 Q. Insane what?</p> <p>18 A. Campell Boy.</p> <p>19 Q. Okay. Were you a friend of his?</p> <p>20 A. Yeah. I was okay with him.</p> <p>21 Q. Okay. Would you ever go to his house</p> <p>22 and hang out?</p> <p>23 A. We went there, yes, a few times.</p> <p>24 Q. Okay. Do you know who Silent is?</p>	<p style="text-align: right;">Page 53</p> <p>1 A. No.</p> <p>2 Q. Okay. Did you ever hang out with him?</p> <p>3 A. No.</p> <p>4 Q. Okay. Sir, do you recall ever pointing</p> <p>5 a gun at a person and then trying to disengage the</p> <p>6 hammer and it going off accidentally?</p> <p>7 MS. HAGY: Objection; form, foundation.</p> <p>8 THE WITNESS: No.</p> <p>9 BY MR. ENGQUIST:</p> <p>10 Q. Okay. So if that's in this court</p> <p>11 reported statement, that would be made up too; is</p> <p>12 that correct?</p> <p>13 MS. HAGY: Objection; form, foundation.</p> <p>14 THE WITNESS: Yes.</p> <p>15 BY MR. ENGQUIST:</p> <p>16 Q. Okay. You want a minute to read it</p> <p>17 over to tell me if there's anything in there that</p> <p>18 is true?</p> <p>19 MS. HAGY: Objection; form, foundation,</p> <p>20 argumentative.</p> <p>21 MR. ENGQUIST: I was asking if he wanted to</p> <p>22 read it.</p> <p>23 THE WITNESS: No.</p> <p>24</p>

<p style="text-align: right;">Page 54</p> <p>1 BY MR. ENGQUIST:</p> <p>2 Q. Okay. Sir, do you remember</p> <p>3 testifying -- we can put that Exhibit Number 1</p> <p>4 away.</p> <p>5 But do you remember testifying in</p> <p>6 your criminal -- in the defense in your criminal</p> <p>7 case?</p> <p>8 A. Yes.</p> <p>9 Q. For the Baez case?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. Do you recall your testimony</p> <p>12 that you were -- and tell me -- do you recall that</p> <p>13 you were saying that you only went along with the</p> <p>14 statement because you were told you were involved</p> <p>15 in the murder, but you were too drunk and didn't</p> <p>16 remember?</p> <p>17 MS. HAGY: Objection; form, foundation.</p> <p>18 THE WITNESS: Yes. I remember saying</p> <p>19 something like that.</p> <p>20 BY MR. ENGQUIST:</p> <p>21 Q. Was that true?</p> <p>22 A. No. It was kind of like I was kind of</p> <p>23 drunk during that day and I was trying to explain</p> <p>24 it; but so many objections and everything, I felt</p>	<p style="text-align: right;">Page 56</p> <p>1 MS. BONJEAN: Okay.</p> <p>2 MR. ENGQUIST: It's Bates stamped CCSAO.38</p> <p>3 through 44.</p> <p>4 BY MR. ENGQUIST:</p> <p>5 Q. Okay. Sir, do you see what's on the</p> <p>6 screen right now?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And it was filed with the court</p> <p>9 on May 15th, 2018, according to the file stamp on</p> <p>10 the top?</p> <p>11 A. Um-hmm.</p> <p>12 Q. Is that --</p> <p>13 A. Yes. Sorry.</p> <p>14 Q. Don't worry about it. It happens to</p> <p>15 everybody?</p> <p>16 Has in here that your attorney at</p> <p>17 the time was Ainsworth, R. Ainsworth?</p> <p>18 A. Yes.</p> <p>19 Q. That's Russell; is that correct?</p> <p>20 A. Correct.</p> <p>21 Q. Okay. And this was -- this report was</p> <p>22 generated on April 24th, 2018, or that's when it</p> <p>23 was ordered, I'm sorry, and it was due in May of</p> <p>24 2018. You see that?</p>
<p style="text-align: right;">Page 55</p> <p>1 like I couldn't get my whole story out.</p> <p>2 Q. But -- but my question is is that true,</p> <p>3 that you were told by another gang member that you</p> <p>4 were involved with it, that's why you gave your</p> <p>5 statement the way you did to the police?</p> <p>6 MS. HAGY: Objection; form, foundation.</p> <p>7 THE WITNESS: No.</p> <p>8 BY MR. ENGQUIST:</p> <p>9 Q. Okay. Let me find the spot here. One</p> <p>10 second.</p> <p>11 Sir, do you recall ever admitting to</p> <p>12 your guilt in the -- in the Baez murder?</p> <p>13 MS. HAGY: Objection; form, foundation.</p> <p>14 THE WITNESS: No.</p> <p>15 MR. ENGQUIST: Okay. Let me pull up --</p> <p>16 sorry. Give me one second.</p> <p>17 Lindsay, screen share -- do you have</p> <p>18 the April 24th, 2018, presentence investigation</p> <p>19 report?</p> <p>20 MS. HAGY: No, I don't.</p> <p>21 MR. ENGQUIST: Okay. I'll screen share it.</p> <p>22 That's fine.</p> <p>23 MS. BONJEAN: This is the PSI?</p> <p>24 MR. ENGQUIST: Yes.</p>	<p style="text-align: right;">Page 57</p> <p>1 A. Yes.</p> <p>2 Q. Left-hand side.</p> <p>3 Okay. All right. And here it's in</p> <p>4 2018. And this is after you'd been released</p> <p>5 from -- is this after you'd been released from the</p> <p>6 prison, sir?</p> <p>7 A. Yes. That was the address I went to</p> <p>8 when I was released.</p> <p>9 Q. So the address listed there is</p> <p>10 7327 West Diversey in Elmwood Park Illinois. That</p> <p>11 was the address that you were living at after your</p> <p>12 release from prison; is that correct?</p> <p>13 A. Yes, except the zip code is incorrect.</p> <p>14 Q. Okay. What is the zip code?</p> <p>15 A. 60707.</p> <p>16 Q. Okay. And let's go to the second page.</p> <p>17 Okay. And I'm going to go down to the bottom --</p> <p>18 I'm sorry. Let's go to the third page. I'm sorry,</p> <p>19 the third page and go down near the bottom.</p> <p>20 And where it says, Defendant's</p> <p>21 Version of the Offense. Do you see that there?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And that's -- there's one</p> <p>24 paragraph and it's in quotes. Do you see that?</p>

<p style="text-align: right;">Page 58</p> <p>1 A. It -- which -- which part?</p> <p>2 Q. It says, Defendant's Version of the</p> <p>3 Offense.</p> <p>4 A. Yes. I'm seeing it.</p> <p>5 Q. Okay. And then there's a paragraph</p> <p>6 that's in quotes.</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Could you read that, please?</p> <p>9 A. It says: It was a bad tragedy. I</p> <p>10 admit guilt in this case. It should have not</p> <p>11 really happen. It is something that I have to live</p> <p>12 with for the rest of my life. A lot of times I</p> <p>13 tried to block it out of my mind, but it is always</p> <p>14 there. I feel extremely remorseful, and I wish I</p> <p>15 could apologize to the victims' families in person.</p> <p>16 I have complete -- completed substance abuse in the</p> <p>17 Illinois Department of Corrections.</p> <p>18 Q. Substance abuse treatment, correct?</p> <p>19 A. Say again?</p> <p>20 Q. Substance abuse treatment?</p> <p>21 A. Yes, treatment.</p> <p>22 Q. Okay.</p> <p>23 A. Abuse treatment.</p> <p>24 Q. Okay. Sir, isn't it true that you gave</p>	<p style="text-align: right;">Page 60</p> <p>1 BY MR. ENGQUIST:</p> <p>2 Q. Okay. When did you begin having these</p> <p>3 substance abuse problem?</p> <p>4 MS. HAGY: Objection; form, foundation.</p> <p>5 THE WITNESS: I didn't have a problem. I</p> <p>6 just participated in the programs to try to get any</p> <p>7 type of educational programs.</p> <p>8 BY MR. ENGQUIST:</p> <p>9 Q. So you went into substance abuse</p> <p>10 treatment at IDOC in order to become educated in</p> <p>11 substance abuse treatment?</p> <p>12 MS. HAGY: Objection; form, foundation,</p> <p>13 misstates prior testimony.</p> <p>14 THE WITNESS: Yes. I was just trying to</p> <p>15 educate a little bit of myself something different.</p> <p>16 There wasn't that much educational programs or</p> <p>17 vocational.</p> <p>18 MR. ENGQUIST: Okay. I'll take that down.</p> <p>19 THE COURT REPORTER: Josh, are you marking</p> <p>20 that Exhibit 2?</p> <p>21 MR. ENGQUIST: Oh, yes. I'm sorry. That</p> <p>22 will be Exhibit Number 2.</p> <p>23 BY MR. ENGQUIST:</p> <p>24 Q. All right. I'm going to show you what</p>
<p style="text-align: right;">Page 59</p> <p>1 that version of the events to the person that was</p> <p>2 doing this presentence investigation before Judge</p> <p>3 Stevenson?</p> <p>4 MS. BONJEAN: Objection to the form of that</p> <p>5 question.</p> <p>6 MS. HAGY: Join. And foundation.</p> <p>7 THE WITNESS: As far as this, I never</p> <p>8 admitted it. I think it was misinterpreted. He</p> <p>9 had asked me some questions and I said, I guess I'm</p> <p>10 going to be looked as guilty on this case when I</p> <p>11 get released.</p> <p>12 BY MR. ENGQUIST:</p> <p>13 Q. Okay. So what he has in quotes there,</p> <p>14 you're saying you were misquoted?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Did you complete substance abuse</p> <p>17 programs within the Illinois Department of</p> <p>18 Corrections?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Did you have a substance abuse</p> <p>21 problem prior to going in -- prior to your arrest</p> <p>22 in 1994?</p> <p>23 MS. HAGY: Objection; form, foundation.</p> <p>24 THE WITNESS: No.</p>	<p style="text-align: right;">Page 61</p> <p>1 I am going to mark as Exhibit 3. It is the social</p> <p>2 assessment that is Bates stamped CCSAO 1871 through</p> <p>3 1876.</p> <p>4 You see that there, sir?</p> <p>5 A. I'm sorry. What am I looking for?</p> <p>6 Q. I'm asking if you see the exhibit.</p> <p>7 I --</p> <p>8 A. Oh, yes.</p> <p>9 Q. -- want to make sure it's working?</p> <p>10 A. Yes, I see it.</p> <p>11 Q. Sorry. It's just an extra step we have</p> <p>12 to do. Normally I would just hand you a piece of</p> <p>13 paper.</p> <p>14 All right. You see on the top there</p> <p>15 it gives the date of December 9th, 1996?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And that's your name there,</p> <p>18 William Negron, correct?</p> <p>19 A. Correct.</p> <p>20 Q. Okay. And at the very beginning of</p> <p>21 this where it says when the second for Updated of</p> <p>22 Student's Educational Experiences on page 1, the</p> <p>23 first paragraph there underneath that section, it</p> <p>24 says, William asserts that he went as far as his</p>

<p style="text-align: right;">Page 62</p> <p>1 sophomore year in Clemente High School.</p> <p>2 That's correct, correct?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Then it says, He states that he</p> <p>5 was beaten up too often at school and finally his</p> <p>6 mother had him removed.</p> <p>7 A. No.</p> <p>8 Q. Is that correct?</p> <p>9 A. No. I was kicked out.</p> <p>10 Q. Okay. Go down.</p> <p>11 All right. For Peer Relationships,</p> <p>12 do you see this section here on page -- it would be</p> <p>13 page 3 of the documents, Bates stamped CCSAO 1873?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Under Peer Relationships, it</p> <p>16 states: William has been involved with gangs</p> <p>17 pretty much in relationship to parties and going</p> <p>18 places. He has been associated with the Insane</p> <p>19 Dragons about three years. He states he has never</p> <p>20 been involved in shooting, but was involved for</p> <p>21 only social benefits.</p> <p>22 You see that there?</p> <p>23 A. Yes, I see it.</p> <p>24 Q. Is that correct?</p>	<p style="text-align: right;">Page 64</p> <p>1 A. It was more like in -- just for in Cook</p> <p>2 County when I was fighting the charges. We were</p> <p>3 just more of correspondence and that's it.</p> <p>4 Q. How did you know Delores?</p> <p>5 A. My -- my brother's girlfriend, she</p> <p>6 contacted me and she started coming to visit me and</p> <p>7 she introduced to Delores.</p> <p>8 Q. Okay. Let's go to page 5 of this</p> <p>9 document, which would be Bates stamp 1875.</p> <p>10 Okay. It says in this section, sir,</p> <p>11 that -- if you look at the third -- third paragraph</p> <p>12 on this page, William had prepared to go to his</p> <p>13 father's home in San Juan because gang activities</p> <p>14 were getting out of hand in the neighborhood.</p> <p>15 You see that?</p> <p>16 A. Yes.</p> <p>17 Q. Is that true, sir?</p> <p>18 MS. HAGY: Objection; form, foundation.</p> <p>19 THE WITNESS: I was getting ready to leave</p> <p>20 the Dragons because of what was being involved with</p> <p>21 the Dragons and my family. I believe that it's</p> <p>22 partially true. My mother wanted me out, and</p> <p>23 during the time she had wanted me to go back to</p> <p>24 Puerto Rico with my father.</p>
<p style="text-align: right;">Page 63</p> <p>1 A. No.</p> <p>2 Q. Okay. What's incorrect about that?</p> <p>3 A. I wasn't as far as associated like for</p> <p>4 this long, I don't think, and for the Dragons. And</p> <p>5 definitely I wasn't involved in shootings. And as</p> <p>6 far as like social media or anything like that.</p> <p>7 Q. Social benefits.</p> <p>8 A. I mean, social benefits. Sorry.</p> <p>9 Yeah. I wasn't as far as like for</p> <p>10 social benefits.</p> <p>11 Q. Okay. Why did you join the Insane</p> <p>12 Dragons?</p> <p>13 A. Like I -- I pretty much knew quite a</p> <p>14 few of them from the area and lot of it was dealing</p> <p>15 for protection.</p> <p>16 Q. Okay. Underneath that paragraph it</p> <p>17 says you had a girlfriend by the of Delores Cortez?</p> <p>18 A. Yes, during the time when I was in Cook</p> <p>19 County Jail.</p> <p>20 Q. Okay. And when did -- and how long had</p> <p>21 you been dating Delores Cortez -- or I'm sorry.</p> <p>22 Let me back that up and strike that.</p> <p>23 When did you first begin dating</p> <p>24 Delores Cortez?</p>	<p style="text-align: right;">Page 65</p> <p>1 BY MR. ENGQUIST:</p> <p>2 Q. Okay. Were you planning on going back</p> <p>3 do San Juan prior to your arrest to live with your</p> <p>4 father?</p> <p>5 A. It wasn't in San Juan, but yes, back to</p> <p>6 Puerto Rico.</p> <p>7 Q. And what steps had you taken to begin</p> <p>8 this move to Puerto Rico?</p> <p>9 MS. HAGY: Objection; form, foundation.</p> <p>10 THE WITNESS: I was talking with my</p> <p>11 grandmother. My grandmother was more of pushing</p> <p>12 the issue towards my mother of getting in contact</p> <p>13 with my father to come up with funds to make the</p> <p>14 flight and everything happen and also to discuss it</p> <p>15 with me.</p> <p>16 BY MR. ENGQUIST:</p> <p>17 Q. Had a date been set for you to move</p> <p>18 back -- or move to Puerto Rico?</p> <p>19 A. It was never discussed as far as a</p> <p>20 date, but that was between -- since I was young,</p> <p>21 between my parents and my grandmother.</p> <p>22 Q. Okay. The next -- the next paragraph</p> <p>23 says: William states he was ready to leave the</p> <p>24 gang and not come back to any of these activities.</p>

<p style="text-align: right;">Page 66</p> <p>1 He wanted to wait until he could accompany both his 2 grandmother and grandfather. 3 You see that there? 4 A. Yes, I see it. 5 Q. Is that a true statement, sir? 6 A. No. 7 Q. Okay. What is untrue about this 8 statement, sir? 9 A. I was already out of the gang, so I 10 don't know why I was saying to -- ready to leave 11 the gang and not come back to these activities. 12 As far as wanted to wait until 13 he could accompany both my grandparents, no. 14 That's -- they were -- they were pretty much -- you 15 know, they would have -- they would have left 16 regardless, if anything, but they were more of 17 wanting me out of the area of being protective of 18 me. 19 Q. Okay. Sir, do you recall having your 20 attorneys ever file anything for reduction in your 21 sentence in the -- in the Baez murder case where 22 you were admitting to your guilt? 23 MS. HAGY: Objection; form, foundation. 24 THE WITNESS: No, I don't recall anything</p>	<p style="text-align: right;">Page 68</p> <p>1 BY MR. ENGQUIST: 2 Q. All right. Do you recall who your 3 criminal defense attorney was in the Baez case? 4 A. Seth Travis. At first it was Thomas 5 Gibbons and Mitchell Kreiter. Then Seth Travis was 6 the -- the majority of the trial attorney. 7 Q. Okay. Was Mr. Sarley also involved? 8 A. I believe it was Sarley. To be honest, 9 I'm not really sure if it was Seth Travis or 10 Sarley, but it sounds familiar, Sarley. I could 11 have had them mixed up. Sorry. 12 Q. Sir, was there ever occasion during the 13 Baez murder proceedings that you overheard someone 14 bragging about being the one who was the real 15 shooter in the Baez murder case and it wasn't you? 16 A. Yes. That was in the -- in the 17 bullpen, when -- the holding in the back in the 18 trial. I informed my -- my attorney, Mr. Gibbons 19 about it and Mr. Gibbons never confronted it. 20 Q. Did you tell anybody else other than 21 Mr. Gibbons that there was a person in back who was 22 involved -- who had been bragging that they were 23 the ones who -- or that they were the person who 24 had killed Mr. Baez?</p>
<p style="text-align: right;">Page 67</p> <p>1 like that. 2 BY MR. ENGQUIST: 3 Q. Okay. If something were filed in court 4 by your attorneys indicating that you took 5 responsibility for Mr. Baez's death, would that be 6 something that you would have approved ahead of 7 time? 8 MS. HAGY: Objection; form, foundation, and 9 gets into attorney/client privilege. 10 You can answer. 11 MR. ENGQUIST: Are you instructing him not to 12 answer? 13 MS. HAGY: No. I just was -- 14 MR. ENGQUIST: Okay. 15 MS. BONJEAN: To the extent it calls for 16 attorney/client privileged communications, I mean, 17 not that I'm his attorney, but, I mean, I think 18 that's what she was saying. 19 MS. HAGY: Yes. 20 MR. ENGQUIST: I'm sorry, Ms. Hagy. I'm not 21 sure what's happening. 22 THE WITNESS: I can't talk about what's going 23 on between attorney/client privilege. 24 MR. ENGQUIST: Oh, okay.</p>	<p style="text-align: right;">Page 69</p> <p>1 A. As far as I know, no. 2 Q. And who was that person that was in the 3 back bragging to you that he had done the murder? 4 A. I really don't know the guy. He was -- 5 I just met him that day, just seen him, and he was 6 talking about it, which resembled a lot of 7 activities that had happened in the -- in the case. 8 Q. I'm sorry. What was that last part? 9 A. He was talking about a lot of -- 10 basically things that had occurred in the case. 11 Q. You mean he was talking about the 12 murder and giving facts that were the same as your 13 case; is that right? 14 A. Basically things that had matched the 15 description of the case. 16 Q. Okay. And what -- what facts did he 17 know about your case when he was talking about his 18 murder? 19 A. He was describing about the car. He 20 was describing about the weapons that were used. 21 And the -- as far as -- as to why. 22 Q. Okay. And what about the car was the 23 same? 24 A. Yes. He was -- he was saying it was a</p>

<p style="text-align: right;">Page 70</p> <p>1 dark blue Delta 88.</p> <p>2 Q. We're talking about the guy confessing</p> <p>3 to the Baez murder, correct?</p> <p>4 A. Oh, sorry. He was -- the Baez, he was</p> <p>5 talking about the -- something about some guns that</p> <p>6 had matched the description of the crime and</p> <p>7 hanging around frequently back around to that area.</p> <p>8 Q. And what area was that?</p> <p>9 A. Washtenaw and Chicago.</p> <p>10 Q. Okay. That's an area that you also</p> <p>11 hung out, correct?</p> <p>12 A. A long time ago, yes.</p> <p>13 Q. Back during the times of the murders;</p> <p>14 isn't that right?</p> <p>15 MS. HAGY: Objection; form, foundation.</p> <p>16 THE WITNESS: Yes.</p> <p>17 BY MR. ENGQUIST:</p> <p>18 Q. Okay. Other than talking about guns in</p> <p>19 that area, what else about it made you believe that</p> <p>20 he was telling you that he was involved in the Baez</p> <p>21 murder, or the Baez murder?</p> <p>22 A. There was -- that was pretty much about</p> <p>23 it, but I just wanted really the attorney to get</p> <p>24 involved and possibly ask him questions to see if</p>	<p style="text-align: right;">Page 72</p> <p>1 you?</p> <p>2 MS. BONJEAN: Objection to the -- to the form</p> <p>3 and foundation of that question. So ridiculous</p> <p>4 too. Because people like you accuse people of</p> <p>5 trying to influence witnesses. That's why they</p> <p>6 tell their lawyers and let it be.</p> <p>7 MR. ENGQUIST: That's -- I'm not sure why</p> <p>8 that was an objection. That was just more of a --</p> <p>9 of a --</p> <p>10 MS. BONJEAN: Because it's --</p> <p>11 MR. ENGQUIST: -- tirade.</p> <p>12 MS. BONJEAN: It's infuriating. It's</p> <p>13 infuriating that you ask these questions when you</p> <p>14 know exactly -- you -- you know exactly what you</p> <p>15 would do if anyone tried to actually find</p> <p>16 witnesses. You know how you accuse people.</p> <p>17 He said he -- he said he told his</p> <p>18 counsel.</p> <p>19 MR. ENGQUIST: I know. Jennifer, I know.</p> <p>20 You can stop.</p> <p>21 BY MR. ENGQUIST:</p> <p>22 Q. Sir, can you please answer my</p> <p>23 questions?</p> <p>24 A. Can you repeat it again?</p>
<p style="text-align: right;">Page 71</p> <p>1 he knows anything.</p> <p>2 Q. Okay. Did you ever find out this</p> <p>3 person's name?</p> <p>4 A. No.</p> <p>5 Q. Okay. Did you make any attempts to</p> <p>6 find out who the person was?</p> <p>7 A. No.</p> <p>8 Q. Why not?</p> <p>9 A. My attorney just --</p> <p>10 MS. HAGY: Don't talk about attorney/client --</p> <p>11 THE WITNESS: Oh, okay.</p> <p>12 Sorry. Can't talk about it.</p> <p>13 BY MR. ENGQUIST:</p> <p>14 Q. Well, you already said you told your</p> <p>15 attorney, so I'm just -- I'm asking you why you</p> <p>16 didn't try to find out his name.</p> <p>17 A. As far as I just decided to -- to not</p> <p>18 try to even go into it.</p> <p>19 Q. Did you ever tell the prosecutors about</p> <p>20 that person in the back?</p> <p>21 A. No.</p> <p>22 Q. You didn't bring it up during the</p> <p>23 murder trial at all, that there was person in the</p> <p>24 back who actually was admitting to the crime, did</p>	<p style="text-align: right;">Page 73</p> <p>1 MR. ENGQUIST: Can you read it back,</p> <p>2 Ms. Court Reporter.</p> <p>3 (The record was read as follows:</p> <p>4 Q. You didn't bring it up</p> <p>5 during the murder trial at all,</p> <p>6 that there was person in the</p> <p>7 back who actually was admitting</p> <p>8 to the crime, did you?)</p> <p>9 THE WITNESS: No, I did not bring it up</p> <p>10 during the trial. I figured it's not going to go</p> <p>11 anywhere. I'm charged for the case and it's just</p> <p>12 going to go through continual deaf ears.</p> <p>13 BY MR. ENGQUIST:</p> <p>14 Q. Okay. If I can just focus your</p> <p>15 attention on -- actually, let me go back.</p> <p>16 Sir, do you know who Reynaldo</p> <p>17 Guevara is?</p> <p>18 A. Yes.</p> <p>19 Q. And how do you know Reynaldo Guevara?</p> <p>20 A. I met him through my mother.</p> <p>21 Q. And when did you first meet him?</p> <p>22 A. 1991.</p> <p>23 Q. When you say met him through his</p> <p>24 mother, where was that?</p>

<p style="text-align: right;">Page 74</p> <p>1 A. We had met through -- first we met at 2 Milwaukee Avenue when he had his motorcycle. And 3 then we -- the second attempt, which we really got 4 a little more acquainted, when he bought his house. 5 Q. You said you met him at Milwaukee 6 Avenue when he had his motorcycle. 7 A. Yes. 8 Q. Was this a planned meeting or you just 9 happened to see him when he was riding his 10 motorcycle? 11 A. We were driving. And I don't know if 12 there was something discussed beforehand, but we -- 13 we seen him over there on Milwaukee Avenue. 14 Q. Were you -- was he with somebody that 15 your mother knew or did your mother know him? 16 A. He was with Mary Arman, with his wife 17 that is now. 18 Q. And what kind of motorcycle? 19 A. I really don't know. 20 Q. Okay. And how long was this meeting at 21 Milwaukee Avenue? 22 MS. HAGY: Objection, form and foundation. 23 THE WITNESS: It was -- it was short. 24</p>	<p style="text-align: right;">Page 76</p> <p>1 Q. So you helped move things in from, I 2 guess, a truck or something into the house? 3 A. As far as in the back, I believe there 4 was a truck, but there was already stuff in the 5 back like of his house that was laid out, and so I 6 was just majority concentrating on that. 7 Q. And were you ever at the house, at 8 Reynaldo Guevara's house, after that time? 9 A. Yes. 10 Q. How many times? 11 A. I would say about two more times. 12 Q. And when was the next time you were at 13 his home? 14 A. It was shortly after. We went in -- I 15 believe it was in November. And then I went back 16 in -- if I'm correct, I think it was in 1993. 17 Q. Okay. So you said November of 1991 you 18 went back. 19 And why -- did you go back with 20 somebody or were you by yourself? 21 A. Yeah. I went back with my mother. I 22 was too young. But I went back with my mother. 23 Q. And why was your mother going over to 24 Reynaldo Guevara's house?</p>
<p style="text-align: right;">Page 75</p> <p>1 BY MR. ENGQUIST: 2 Q. And then you said you -- you met him 3 later for a longer period of time at his home? 4 A. Yes. In 1991. 5 Q. And where was this home? 6 A. At 57th Place. 7 Q. You remember you remember the cross 8 street or around where it was? 9 A. It was close by Central Park, right by 10 the tracks. 11 Q. And what brought you to his home? 12 A. He was just moving, as far as I know, 13 into the house. 14 Q. But what brought you to that house when 15 he was moving into the house? 16 A. Oh, we -- my mother. I guess they 17 needed help and she said we're going to Rey's 18 house. 19 Q. And what kind of help did your mother 20 provide? 21 A. Helping out I guess with furniture, but 22 I was majority already helping out with other 23 things, you know, bags that they needed to be 24 brought in, things like that.</p>	<p style="text-align: right;">Page 77</p> <p>1 A. She just wanted to -- that was her best 2 friend. She just wanted to meet up with her best 3 friend so I knew her kids. 4 Q. And what did you do when you went over 5 there? Did you just hang out with the kids? 6 A. The majority, yes. I hanged out with 7 Tony; we knew each other since we were young. And 8 Myra. 9 Q. What's Tony's last name? 10 A. Johnson. 11 Q. Are you still friends with Tony 12 Johnson? 13 A. No. I haven't -- I haven't seen him 14 since that time. 15 Q. And when you were over at the house in 16 19 -- November of 1991, did you speak at all with 17 Reynaldo Guevara? 18 A. Yes. We -- we spoke. He showed me 19 some -- some weapon that he had. I was assuming 20 that was his service weapon. 21 Q. Anything else? 22 A. He -- he just talked about -- I 23 overheard him one day talking about -- as we were 24 moving, about some guy that had put a complaint</p>

<p style="text-align: right;">Page 78</p> <p>1 against him, a African-American man that had bit 2 him, and he laughed about it and said that, Like 3 like it's going to go anywhere. 4 Q. I just want to make sure I have this 5 right. 6 You said he was talking about a 7 complaint that Rey bit him or the man bit Rey 8 Guevara? 9 A. I heard him say that the man bit him. 10 Q. The man bit him. 11 Okay. Any other conversations with 12 Reynaldo -- was that during the moving time or 13 during the November time that he gave -- he told 14 you the story about -- or you overheard him talking 15 about a complaint against him? 16 A. I believe it was in the -- after the 17 moving time in November. 18 Q. Okay. 19 A. Yeah. 20 Q. Did you have any other conversations 21 with Reynaldo Guevara back in the November 1991 22 time you were at his house? 23 A. As far as that, pertaining to anything 24 alarming like that, no. But other than that, we</p>	<p style="text-align: right;">Page 80</p> <p>1 Time is 12:08 p.m. 2 BY MR. ENGQUIST: 3 Q. Okay. Now, sir, you were saying that 4 you heard things from I believe his son, his 5 stepson, Reynaldo Guevara's stepson. Was that -- 6 is that Tony Johnson? 7 A. Correct. 8 Q. Okay. And you said you heard things 9 about Reynaldo Guevara. Was this before 19 -- 10 before you were arrested in 1994 that you heard 11 things about Reynaldo Guevara from Tony Johnson? 12 A. Yes. 13 Q. Okay. And what you did hear from Tony 14 Johnson prior to 1994 which made you not want to 15 become a police officer anymore? 16 A. He -- it was the way how he kept 17 photographs in his house of certain individuals in 18 a shoebox. I kind of found it alarming. 19 But it was just when he talked about 20 that African-American guy and what he did and Tony 21 being half -- half African-American himself, it 22 kind of gave a different view of how -- how I 23 viewed him. But he was telling me that -- as I 24 continued talking with him, how he had threatened</p>
<p style="text-align: right;">Page 79</p> <p>1 were just talking about he wanted me to -- see what 2 I wanted to do in life, maybe become a cop or 3 something like that. 4 Q. And did you have a goal in what you 5 wanted to be in life? 6 A. During the time, I -- I wanted to 7 become in the force, but to be honest, after seeing 8 things like that of his conduct, things that -- 9 what his stepson was telling me and what I was 10 hearing, it kind of like changed -- changed 11 everything for me. 12 Q. Well, when you said changed everything 13 for you, was this after your arrested or before you 14 were arrested, sir? 15 A. It was during the time, man. 16 Q. You need a minute, sir? 17 Okay. Why don't we take a five 18 minutes, Lindsay, and then we can come back on. 19 Okay? 20 MS. HAGY: Okay. 21 THE VIDEOGRAPHER: We are off the record at 22 12:01. 23 (Recess taken.) 24 THE VIDEOGRAPHER: We are back on the record.</p>	<p style="text-align: right;">Page 81</p> <p>1 Tony of -- about putting a case on him if he 2 misbehaved. 3 Q. Anything else? 4 A. As far as? 5 Q. That Tony told you. 6 A. That Tony told me, yeah, that's about 7 it. 8 Q. Okay. Do you know if Reynaldo Guevara 9 ever put a case on Tony? 10 A. Not that I know of. 11 Q. And you said you also heard other 12 things about Reynaldo Guevara, other than things 13 you heard from Tony, which caused you not to want 14 to become a police officer anymore. 15 And what were those things, sir? 16 A. How he would -- Myra -- I mean, sorry 17 Marcy, she -- she didn't want to stay with him 18 because, according to her, that she was -- she had 19 witnessed him I guess getting physical with Mary 20 and threatening as far as them with the kids being 21 that they're not his biological and that's his 22 house. So she really didn't want to stay under his 23 roof, so she was living elsewhere. 24 Q. I'm sorry. Just a second.</p>

<p style="text-align: right;">Page 82</p> <p>1 You said Marcy. Who is Marcy?</p> <p>2 A. Marcy is the third child from Mary</p> <p>3 Arman from -- they're under Bill Johnson, their</p> <p>4 biological father.</p> <p>5 Q. Anything else that you heard? You</p> <p>6 heard something from Marcy and from Tony. Anything</p> <p>7 else that you heard about Reynaldo Guevara which</p> <p>8 made you not want to become a police officer?</p> <p>9 A. As far as Marcy says -- like as far as</p> <p>10 Marcy, she says that she -- she couldn't really be</p> <p>11 around him out of fear because, you know, he was</p> <p>12 kind of like threatening and she was kind of scared</p> <p>13 of him.</p> <p>14 So I -- I figured, you know, if</p> <p>15 their -- if he's like that and he's saying he's</p> <p>16 putting cases on people, that's what would --</p> <p>17 basically it kind of changed my whole perspective</p> <p>18 on becoming a police officer during the time.</p> <p>19 Q. Now, just to be clear, when you were</p> <p>20 saying "putting cases on people," you were saying</p> <p>21 that Tony said that he was threatened by his</p> <p>22 stepfather, that he would put a case on him.</p> <p>23 Did anybody else tell that Rey was</p> <p>24 threatening them to put a case on them?</p>	<p style="text-align: right;">Page 84</p> <p>1 told you that she was afraid of Reynaldo Guevara?</p> <p>2 A. Not at the house, no. I ended up</p> <p>3 bumping into her at a different location.</p> <p>4 Q. Okay. What location?</p> <p>5 A. Close by like Haddon and Washtenaw.</p> <p>6 Q. Were you with anybody when this</p> <p>7 conversation took place between you and Marcy?</p> <p>8 A. No. I was just walking by and I bumped</p> <p>9 into her. She said she lived nearby and we just</p> <p>10 started talking. I asked her, you know, when's the</p> <p>11 last time she ever seen her mom, things like that.</p> <p>12 And that's when she started expressing to me as far</p> <p>13 as, you know, about him and as to why.</p> <p>14 Q. Okay. Was this before or after the --</p> <p>15 after your next visit to Reynaldo Guevara's house</p> <p>16 in 1993?</p> <p>17 A. Say again.</p> <p>18 Q. Was this conversation with Marcy on the</p> <p>19 street, was this before or after your last visit to</p> <p>20 Reynaldo Guevara's house in 1993?</p> <p>21 A. That was in 1993, but it wasn't the</p> <p>22 last-last time. That was, as far as like in</p> <p>23 1993 -- so there won't be no confusion, 1991 and</p> <p>24 '93 when I went to Guevara's house, within them two</p>
<p style="text-align: right;">Page 83</p> <p>1 A. During the time, no.</p> <p>2 Q. Okay. And this is -- and I'm not</p> <p>3 trying to put a -- I'm trying to put a timetable on</p> <p>4 it. This was in between -- you heard these things</p> <p>5 about Rey from both Marcy and Tony from November of</p> <p>6 1991 until sometime before your arrest; is that</p> <p>7 correct?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And do you have an idea of when</p> <p>10 you heard these things from them?</p> <p>11 A. It was -- as far as an exact month or</p> <p>12 date, no.</p> <p>13 Q. Okay. Do you remember a year?</p> <p>14 A. As far as Marcy, she had talked to me,</p> <p>15 and that was in 1993.</p> <p>16 Q. Okay.</p> <p>17 A. As far as Tony, that was around in</p> <p>18 1991.</p> <p>19 Q. Okay. All right. Now, you said you</p> <p>20 were back at his house in 1993. That was your --</p> <p>21 your next time at his house?</p> <p>22 A. Yes.</p> <p>23 Q. Was this -- was this time back in 1993,</p> <p>24 is this the time you talked to Marcy where Marcy</p>	<p style="text-align: right;">Page 85</p> <p>1 years is when I went with my mother.</p> <p>2 Q. Okay. Before we go to 1993 when you</p> <p>3 went with your mother to Reynaldo Guevara's house,</p> <p>4 my question, though, this conversation you had with</p> <p>5 Marcy on the street, was this before or after your</p> <p>6 visit in 1993 with your mom to Reynaldo Guevara's</p> <p>7 house?</p> <p>8 A. That would have been after.</p> <p>9 Q. Now, this 1993 time when you went to</p> <p>10 Reynaldo Guevara's house with your mom, do you</p> <p>11 remember what time of year it was?</p> <p>12 A. I believe it was close to like fall, if</p> <p>13 I'm correct.</p> <p>14 Q. And what was the reason for going to</p> <p>15 the house in 1993?</p> <p>16 A. She just -- my mother just wanted to</p> <p>17 visit her, to visit Mary, being that they were best</p> <p>18 friends.</p> <p>19 Q. And why were you going?</p> <p>20 A. Majority, you know, being young, that</p> <p>21 she was like, You got to come. I really didn't</p> <p>22 kind of feel comfortable going to much because of</p> <p>23 Rey, but majority -- I just decided to tag along.</p> <p>24 I had no choice, being young, and I figured, Well,</p>

<p style="text-align: right;">Page 86</p> <p>1 I could just go and hang out with Tony.</p> <p>2 Q. Did you ever tell your mom about your</p> <p>3 concerns or how uncomfortable you were around</p> <p>4 Reynaldo Guevara prior to this 1993 visit at</p> <p>5 Reynaldo Guevara's home?</p> <p>6 A. Yes. That 1993 -- in 1993, as we were</p> <p>7 leaving the leaving the house, I had told her. And</p> <p>8 that was the last time her and I went together.</p> <p>9 Q. Okay. So that was after you were</p> <p>10 leaving?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. So how long were you at Reynaldo</p> <p>13 Guevara's house back in 1993 in what you believe</p> <p>14 the fall?</p> <p>15 A. We went there and -- and it was I could</p> <p>16 say hours, but majority I hanged around with Myra</p> <p>17 and Tony.</p> <p>18 Q. Okay. So you hung out with the kids</p> <p>19 and then when your mom was done you left; is that</p> <p>20 correct?</p> <p>21 A. Yeah. When -- basically they</p> <p>22 discussed -- you know, she socialized majority of</p> <p>23 time with Mary. I really didn't want to even try</p> <p>24 to talk to Guevara. But other than that, I was</p>	<p style="text-align: right;">Page 88</p> <p>1 him to know anything about me, so I'd just rather</p> <p>2 not even tell him.</p> <p>3 BY MR. ENGQUIST:</p> <p>4 Q. Okay. After the fall of 1993, were you</p> <p>5 ever at Reynaldo Guevara's house again?</p> <p>6 A. Yes.</p> <p>7 Q. When?</p> <p>8 A. In 1994, my mother received a phone</p> <p>9 call from Mary and -- asking her how come she</p> <p>10 doesn't come through to come and see -- see her</p> <p>11 anymore. I -- during the time, I really don't know</p> <p>12 who she was talking to because I was in my bedroom</p> <p>13 and she was in the kitchen phone. I heard her ask</p> <p>14 three things to -- to my mother. And one of them</p> <p>15 was who I hanged around with, what kind of car I</p> <p>16 drove, and if I still go to the neighborhood on</p> <p>17 Augusta.</p> <p>18 Q. And when was this in 1994 that those</p> <p>19 questions were being asked, who you hung out with,</p> <p>20 what kind -- what car you drove, and did you still</p> <p>21 hang out in Augusta?</p> <p>22 A. It was around September '94.</p> <p>23 Q. Okay. So I'm assuming you're hearing</p> <p>24 one side of the conversation; you're hearing your</p>
<p style="text-align: right;">Page 87</p> <p>1 just majority trying to entertain Tony and Myra.</p> <p>2 Q. Okay. Did you have any contact with</p> <p>3 Reynaldo Guevara when you were at his house in the</p> <p>4 fall of 1993?</p> <p>5 A. Yes.</p> <p>6 Q. And what was that?</p> <p>7 A. We just -- at most it was like, How you</p> <p>8 doing. He would ask me like if I'm joining any</p> <p>9 gangs. Like: Are you in any gang? You better not</p> <p>10 be in any gang. I will finds out. I -- I know all</p> <p>11 these guys, all these gang chiefs. So ...</p> <p>12 Q. At that point you were a member of the</p> <p>13 Insane Dragons; isn't that correct?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Did you tell him that you were a</p> <p>16 member of the Insane Dragons?</p> <p>17 A. No.</p> <p>18 Q. Why not?</p> <p>19 MS. HAGY: Objection; foundation, form.</p> <p>20 THE WITNESS: I was kind of scared of even</p> <p>21 letting him know. I just didn't know after hearing</p> <p>22 all of these -- all of these accusations about him</p> <p>23 of how his conduct's been. I just -- I was kind of</p> <p>24 scared of him during that time. I just didn't want</p>	<p style="text-align: right;">Page 89</p> <p>1 mother's part of the conversation?</p> <p>2 MS. HAGY: Objection; form, foundation.</p> <p>3 THE WITNESS: After I heard what was going</p> <p>4 on, I came out of the room and I asked my mother</p> <p>5 who was she talking to. She explained herself as</p> <p>6 to what was Mary asking her pertaining to me.</p> <p>7 Because I'm hearing myself getting involved as far</p> <p>8 as if I still go to the same neighborhood and --</p> <p>9 and who I hanged around with and what kind of car I</p> <p>10 drive, and I'm hearing her giving the descriptions</p> <p>11 regarding me, like what kind of car I drove, who I</p> <p>12 hang with, things of that nature.</p> <p>13 So that's what drew my alarm to even</p> <p>14 ask my mother who was she talking to. Once she</p> <p>15 told me, I immediately ran to the phone, hanged up</p> <p>16 the phone on her. She got upset and stated, Don't</p> <p>17 you ever do that. So I explained to her, Why do</p> <p>18 you think she's asking these three questions and</p> <p>19 you know her husband is.</p> <p>20 BY MR. ENGQUIST:</p> <p>21 Q. Okay. Who did you hear your mother say</p> <p>22 you hung out with?</p> <p>23 A. She was talking to Mary Arman, which is --</p> <p>24 Q. No.</p>

<p style="text-align: right;">Page 90</p> <p>1 A. -- which is Rey Guevara --</p> <p>2 Q. But who did you hear her say you hung</p> <p>3 out with? Who are the people -- when you were</p> <p>4 hearing her side of the conversation --</p> <p>5 A. Yes.</p> <p>6 Q. -- what names did your mother give when</p> <p>7 she was answering the question about who you hung</p> <p>8 out with?</p> <p>9 A. She was saying Flaco. She was asking</p> <p>10 me who do hang with, is it Flaco. And I said I</p> <p>11 haven't seen him in a while. But she said, Well,</p> <p>12 she wants to know if you've hanged around with him.</p> <p>13 I said, Who you talking to? And she said, Well,</p> <p>14 what do -- what do they call him? And I said, They</p> <p>15 called him Joker, but why? And she -- she said,</p> <p>16 What kind of car you -- what kind of car is that</p> <p>17 that -- you know, that you drive? I said, it's a</p> <p>18 Buick, you know. So she told her the color of the</p> <p>19 car. They started laughing about -- according to</p> <p>20 her that they were laughing about as far as like</p> <p>21 things sticking off from the back seat of my -- my</p> <p>22 bumper. She said it was the bumper in the back</p> <p>23 seat and how -- how I drive. And she asked like if</p> <p>24 I still go to Augusta to see my grandmother.</p>	<p style="text-align: right;">Page 92</p> <p>1 to -- to go -- it went out. Okay. I decided to</p> <p>2 drive to go and talk to her as to why she's asking</p> <p>3 these questions, and Guevara was there present.</p> <p>4 Q. Okay. So how soon after the</p> <p>5 conversation on the phone your mother had with Mary</p> <p>6 did you hop in your car and go over to Reynaldo</p> <p>7 Guevara's house?</p> <p>8 A. The next day.</p> <p>9 Q. Okay. And do you remember when that</p> <p>10 was?</p> <p>11 A. The exact date, no, but I just know it</p> <p>12 was September.</p> <p>13 Q. September of 1994, correct?</p> <p>14 A. Correct.</p> <p>15 Q. Okay. And you said when you arrived at</p> <p>16 the house, were you by yourself?</p> <p>17 A. I was by myself, yes.</p> <p>18 Q. Okay. And you said Reynaldo Guevara</p> <p>19 was home then?</p> <p>20 A. Yes. Reynaldo Guevara was there, Mary</p> <p>21 Guevara, and Tony Johnson, and Dominic Guevara.</p> <p>22 Q. So when you arrived there, who did you</p> <p>23 speak to?</p> <p>24 A. I just -- at first when I drove there,</p>
<p style="text-align: right;">Page 91</p> <p>1 Q. Okay. And who's Flaco?</p> <p>2 A. Flaco is -- my family name called</p> <p>3 Roberto Almodovar, Jr. Flaco because he was really</p> <p>4 skinny during the time. So that's means skinny in</p> <p>5 Spanish.</p> <p>6 Q. So was your mother responding --</p> <p>7 according do your mother, whatever she told you,</p> <p>8 was she responding to a direct question on whether</p> <p>9 or not you hung out with Roberto Almodovar, Jr.?</p> <p>10 MS. BONJEAN: Form, foundation.</p> <p>11 MS. HAGY: Join.</p> <p>12 THE WITNESS: She was asking me, yes, if I</p> <p>13 still hang around with him. And I told her the</p> <p>14 truth, I haven't seen him in a long while.</p> <p>15 BY MR. ENGQUIST:</p> <p>16 Q. Okay. Putting aside that phone call,</p> <p>17 when I was asking before, my question was after the</p> <p>18 fall visit in 1993, were you ever at Reynaldo</p> <p>19 Guevara's house again?</p> <p>20 A. Yes. When you had asked that, I</p> <p>21 figured that you were asking as far as like with my</p> <p>22 mother.</p> <p>23 The last time I went was right after</p> <p>24 that conversation took place. I decided to drive</p>	<p style="text-align: right;">Page 93</p> <p>1 I -- I seen in the park heading towards his house,</p> <p>2 I seen Dominic and Tony. I parked my car by the</p> <p>3 park. I talked to them for a little bit. Then I</p> <p>4 walked towards Guevara. Tony wanted to know as to</p> <p>5 why I was going to go see Guevara. And he just</p> <p>6 said, Man, you're crazy for even trying to even</p> <p>7 talk to that guy after what I told you.</p> <p>8 So I just wanted to see what was the</p> <p>9 nature as to why all these three questions. You</p> <p>10 know, I just found it will really odd. So I seen</p> <p>11 Guevara on the front of his house with Mary. Mary</p> <p>12 asked me where Sara at, did you come alone. I</p> <p>13 assumed that she thought that they were coming to</p> <p>14 visit. And I said, no, I came by myself. Guevara</p> <p>15 asked me, do you have your license with you if</p> <p>16 you're driving over here. I told him the truth,</p> <p>17 no. I didn't have a license during the time, but</p> <p>18 he -- I asked them if -- why did -- you know, was</p> <p>19 she asking these questions. That's when Guevara</p> <p>20 starting raising his voice a little bit and said,</p> <p>21 Are you hanging with this guy? He's -- you know,</p> <p>22 He's a Dragon. And I said he's -- he's not a</p> <p>23 Dragon. He's -- he left that stuff alone, you</p> <p>24 know. And that's when he started -- he was saying</p>

<p style="text-align: right;">Page 94</p> <p>1 about a sawed-off shotgun. He said, How come he 2 got caught with a shotgun if he's not a Dragon. I 3 told him, I don't know, but I know he's not part of 4 that have anymore. So I told Mary why would she 5 asking these three questions from my mom. Guevara 6 said, You better hope I don't get that case. 7 So I brought up something that I 8 wasn't supposed to. I brought up the thing that I 9 had told you when -- what I heard in 1991. 10 Q. I'm sorry. Which -- which thing is 11 this? 12 A. With the guy that he said that put a 13 complaint on him, the African-American guy. He -- 14 he got angry at Mary and looked at her and said, 15 This is what you're telling him? You know, how did 16 he finds out? Did you say this to Sara? 17 And, you know, I said, no, I heard 18 you. I heard you. I was by the stairs in the 19 back. He -- I started raising allegations towards 20 him that day and I said, Well, you know, you -- you 21 got always an odd twist to things, of how you do 22 things. They're not the right way. You know, with 23 these pictures that he has. I mean, like who does 24 that? Keeping them in their house instead of their</p>	<p style="text-align: right;">Page 96</p> <p>1 A. Yes. There's only -- his house is two 2 houses away from the corner, so I went to the third 3 house that's on his side. 4 Q. Why did you go to that house? 5 A. I knew that the people that originally 6 had the one on the corner, he had got rid of them, 7 according to what I overheard Mary had said a long 8 time ago, but it was over a phone call. And I 9 heard my mother talking to Mary, and it was -- they 10 were -- he was -- according to him, he said that 11 they were illegals and they weren't supposed to be 12 here. So he -- they said he got rid of them. So I 13 figured nobody living at that house, so I went to 14 the other house. 15 Q. Okay. Why did you go do -- did you 16 know these neighbors that you were knocking on the 17 door to make allegations about Reynaldo Guevara to? 18 A. I did not know him, but I didn't know 19 what else to do. I was young. I knew he was -- he 20 was on some type of corruption. So I informed the 21 neighbor that he was -- he was trying to frame 22 another person and he was trying to frame it sounds 23 like with me. Normally, you know, people look at a 24 young child just running up to the door and just</p>
<p style="text-align: right;">Page 95</p> <p>1 job area? It was -- him threatening Tony. 2 So what really got him pissed off 3 was when I brought up Bill Johnson as well and I 4 told Mary, You should have stood with Bill Johnson. 5 I -- I automatically went to the 6 neighbor and I knocked on the door and I told him 7 what Guevara was trying to do and trying to frame 8 Roberto Almodovar. He was yelling at me and he 9 says, Now I'm asking you where were you at? And I 10 says, What are you talking about? And he says, 11 There was a crime that had occurred and I want to 12 know where you were at. And I said, Why are you 13 concerned about me as far as where I was at? And 14 he says, Well, you better hope that I don't get 15 that case. 16 And during the time I really didn't 17 know what he was talking about and he really didn't 18 explain himself, but he acted like I already knew 19 what he was talking about. 20 Q. You said you went to a neighbor's house 21 and told them that he was trying to frame and 22 Roberto Almodovar, Jr.? 23 Which -- which neighbor? Are you 24 talking about Rey's neighbor?</p>	<p style="text-align: right;">Page 97</p> <p>1 accusing, making accusations, are not, you know, 2 going to take heed to that I'm really saying. 3 Q. Okay. And did you speak to the 4 neighbor and make these allegations? 5 A. Yes. 6 Q. Okay. 7 A. I knocked at his door, he answered, and 8 I told him. 9 Q. Okay. And do you remember what this -- 10 do you know this person's name at all? 11 A. No. 12 Q. Do you know -- 13 A. I just knocked on the door. 14 Q. Okay. Do you know what he looked like? 15 A. He was a Caucasian man, kind of like 16 brownish -- brownish hair. 17 Q. And did this Caucasian man with 18 brownish hair respond to you at all or did you just 19 talked to him? 20 A. I talked to him and he came out of his 21 house. He -- I didn't know that he knew Guevara. 22 So he stepped out and he says, You know, what is 23 going on here? And he just kind of like smiled 24 like, What's going on with this guy? Why is this</p>

<p style="text-align: right;">Page 98</p> <p>1 guy saying these things about you.</p> <p>2 Guevara was like You know I'm a cop,</p> <p>3 you know, I have a right to ask questions. That's</p> <p>4 my job. So the guy just made -- I guess Guevara</p> <p>5 just made it seem like it was just procedure from</p> <p>6 the police department, that being that he's a cop</p> <p>7 that he has a right to ask these questions.</p> <p>8 Q. And what did you do after that?</p> <p>9 A. I decided to leave. I was walking away</p> <p>10 and he just told me, If you want to make any</p> <p>11 complaints, you could always talk to Biebel or</p> <p>12 Mingey. Mingey's my sergeant. You can make a</p> <p>13 report on -- with him.</p> <p>14 So I informed him, and I said, Why</p> <p>15 do you -- you know, you know these guys, why would</p> <p>16 I make an accusation if you know these guys?</p> <p>17 So I had left and I went in my car</p> <p>18 and that's it.</p> <p>19 MR. ENGQUIST: Okay. So we're about to move</p> <p>20 on to another section and we're at the time,</p> <p>21 actually a little after, that you wanted to take a</p> <p>22 break.</p> <p>23 How long do you need for lunch,</p> <p>24 Ms. Hagy?</p>	<p style="text-align: right;">Page 100</p> <p>1 A. Yes. In -- I had called him in around</p> <p>2 the time of 1990 -- 1997 in a collect call which he</p> <p>3 answered. We had talked. We talked about even</p> <p>4 what we just discussed of me coming over there. I</p> <p>5 figured the reason also was just to somehow try to</p> <p>6 prove my innocence that this guy was lying,</p> <p>7 Mr. Guevara in regards to not knowing me, for one.</p> <p>8 For two, the nature as far as also for calling him</p> <p>9 is why would you even accept a collect call from</p> <p>10 somebody you don't even know. And it was -- the --</p> <p>11 it was specifically from me because it would say my</p> <p>12 name, but it was also to discuss to him that I did</p> <p>13 not commit the crime. And to also talk to Mary as</p> <p>14 well regarding that day of what we just discussed.</p> <p>15 Q. Okay. Do you remember when in 1997 --</p> <p>16 let me go back.</p> <p>17 In 1997, you would have been calling</p> <p>18 collect from Cook County Jail, correct?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And do you remember when in 1997</p> <p>21 you made this collect call to Reynaldo Guevara's</p> <p>22 home?</p> <p>23 A. It was around in the summertime. I</p> <p>24 know that.</p>
<p style="text-align: right;">Page 99</p> <p>1 MS. HAGY: Half hour? Yeah, half hour.</p> <p>2 MR. ENGQUIST: Are you sure you want a half</p> <p>3 an hour? You took a little bit longer last time,</p> <p>4 so I'm asking.</p> <p>5 MS. HAGY: I know. I think William's a</p> <p>6 faster walker.</p> <p>7 MR. ENGQUIST: Do you want to take 45 minutes</p> <p>8 just to be safe? Because we were about an hour</p> <p>9 last time.</p> <p>10 MS. HAGY: Sure. Thank you.</p> <p>11 MR. ENGQUIST: Okay. 45 minutes then. We'll</p> <p>12 be back in about 45 minutes.</p> <p>13 THE VIDEOGRAPHER: Off the record at 12:37.</p> <p>14 (Recess taken.)</p> <p>15 THE VIDEOGRAPHER: We are back on the record.</p> <p>16 Time is 1:31 p.m.</p> <p>17 BY MR. ENGQUIST:</p> <p>18 Q. Okay. Sir, before we took a break, you</p> <p>19 had gone through several occasions, ending with the</p> <p>20 occasion in September of 1994 where you spoke with</p> <p>21 Reynaldo Guevara.</p> <p>22 Are there any other occasions that</p> <p>23 you spoke with Reynaldo Guevara that we have not</p> <p>24 talked about already?</p>	<p style="text-align: right;">Page 101</p> <p>1 Q. And how did you happen to have his home</p> <p>2 number?</p> <p>3 A. I had an interview -- like not</p> <p>4 interview, but notes from my mother and I from</p> <p>5 corresponding. And we were -- according to the</p> <p>6 notes, she had her -- his phone number on there, so</p> <p>7 I decided to give it a call and give it a shot.</p> <p>8 Q. Do you still have any of these notes?</p> <p>9 A. Not at hand, not right now, no.</p> <p>10 Q. But do you have them maybe not with you</p> <p>11 right now, but do you have these notes that you and</p> <p>12 mother shared about your murder case?</p> <p>13 A. I had them -- my mother has them at her</p> <p>14 house.</p> <p>15 MR. ENGQUIST: Okay. Lindsay, I'd like to</p> <p>16 get a copy of those. I didn't realize there were</p> <p>17 other documents out there.</p> <p>18 MS. HAGY: Okay. We'll see if we can locate</p> <p>19 those.</p> <p>20 MR. ENGQUIST: I appreciate it.</p> <p>21 BY MR. ENGQUIST:</p> <p>22 Q. When's the last time you saw these</p> <p>23 notes?</p> <p>24 A. I -- I've had them for quite some time</p>

<p style="text-align: right;">Page 102</p> <p>1 now. I had since around that time of '97, but it 2 was based on letters from my mother. 3 Q. Okay. You said you had these notes. 4 Were they in your possession until recently they 5 were with your mother? 6 A. Yeah. After I was convicted for the 7 Baez case, I sent everything because I didn't want 8 nothing to get lost because I was transitioning 9 into the prison, so I sent everything to my 10 mother's house. 11 Q. And when's the last time you saw them? 12 A. When I was released, I was going 13 through it -- through the paperworks, what she 14 saved, things like that. 15 Q. All right. Just going back to this 16 collect phone call in 1997. You said you spoke to 17 Guevara about what we talked about. You're talking 18 about the time where you went to his house and 19 accused him and -- of misconduct and you had that 20 discussion with him on the front steps where you 21 went to the neighbor. That's what we're talking 22 about, correct? 23 A. Correct. 24 Q. Okay. So when you spoke to him about</p>	<p style="text-align: right;">Page 104</p> <p>1 Q. Okay. And when he said he would do 2 things for him. Did you just -- did you have an 3 understanding of what he was talking about? 4 A. He didn't really go into any detail. 5 He just said that he does things for him, that he 6 kind of shows him things of how to go around 7 things, but he really didn't go into any depth. 8 Q. All right. And how long was this 9 collect phone call you had with Reynaldo Guevara? 10 A. I would say about maybe around 20 to 11 25 minutes. 12 Q. Was this before or after your criminal 13 trial in the Baez case? 14 A. There was after. I was about to get 15 transitioned to the prison. 16 Q. Okay. Did you tell anybody about this 17 collect phone call you had with Reynaldo Guevara? 18 A. I -- I didn't tell anybody because at 19 the time I didn't have an attorney. I was getting 20 forwarded to the public defender's officer's for 21 the appellate division for appeals division, but 22 I -- I discussed it with them. But other than 23 that, I don't really know as far as everybody was 24 just like, well, I'm just here doing the -- between</p>
<p style="text-align: right;">Page 103</p> <p>1 that, did he acknowledge that you accused him of 2 misconduct in front of his house? 3 A. Yeah. He's acknowledged. He said, I 4 know you were -- you felt a kind of way. He 5 continued to agree that -- that I should have just 6 complained to his sergeant or if I wanted to choose 7 a different pursuit of talking to people. I in 8 return informed Guevara that why would I accuse 9 them if -- why would I bring an accusation in front 10 of people that you already know? It just feels 11 sort of like a conflict of interest; it wouldn't be 12 fair. 13 So -- and that was just in my eyes. 14 So he -- he further started -- him and I started 15 to, you know, talk. And I asked him, you know, Who 16 else do you know? And he says, Well, I do know 17 brother. And he just said that -- I asked him did 18 he ever do anything, and he just said as far as 19 Biebel, the one that he's more closer to, is the 20 state attorney one, that he does things for him. 21 Q. The state's attorney one you're talking 22 about, Sergeant Biebel's brother, Rey was saying 23 he's close to? 24 A. That's what he was saying.</p>	<p style="text-align: right;">Page 105</p> <p>1 the appeals process, what's -- what's on record, 2 what I could deal with, anything with newly 3 discovered evidence that has to deal as far as like 4 a post-conviction petition under newly discovered 5 evidence. 6 Q. Okay. So I'm -- there's a lot to 7 unpack there, but you -- I just want to make sure 8 I have this correct. 9 Did you tell your appellate attorney 10 that you had this collect phone call with Reynaldo 11 Guevara from the Cook County Jail? 12 A. Yeah. Her and -- him and I, we 13 discussed and -- 14 MS. HAGY: Don't discuss -- I'm instructing 15 him not to discuss conversations with his attorney. 16 BY MR. ENGQUIST: 17 Q. Did you tell anyone else about this 18 conversation you had with Reynaldo Guevara over the 19 collect phone call? 20 A. Just as far as like my mother, I 21 discussed it with her. And I believe that was 22 about it. 23 Q. Did you take any steps to get the 24 recording of this phone call?</p>

<p style="text-align: right;">Page 106</p> <p>1 A. I did not --</p> <p>2 MS. BONJEAN: Objection.</p> <p>3 THE WITNESS: -- know --</p> <p>4 MS. BONJEAN: Hold on.</p> <p>5 Objection, form and foundation.</p> <p>6 You can answer, Willie.</p> <p>7 THE WITNESS: Yeah. I don't -- I don't know</p> <p>8 how to even obtain something like that. I don't</p> <p>9 have the experience or even knowledge of even</p> <p>10 trying to get something like that.</p> <p>11 BY MR. ENGQUIST:</p> <p>12 Q. Now, you are aware when you would make</p> <p>13 those phone calls that you would hear the -- the</p> <p>14 call indicate that the calls were being recorded?</p> <p>15 There would be a --</p> <p>16 A. (Nodding.)</p> <p>17 Q. So you know -- is that correct?</p> <p>18 A. Correct. That was also the reason why</p> <p>19 I wanted. And I was hoping that he would accept</p> <p>20 it, in which he did accept, and him and I discussed</p> <p>21 it. And that's one of the reasons, as I was</p> <p>22 telling you, that it was part of like trying to get</p> <p>23 him in so many ways in perjury. Because why would</p> <p>24 a person that didn't know you accept a collect</p>	<p style="text-align: right;">Page 108</p> <p>1 conversation in 1997, did you ever have any other</p> <p>2 conversations with Reynaldo Guevara?</p> <p>3 A. No.</p> <p>4 Q. Okay. Besides you saying now that</p> <p>5 Reynaldo Guevara mentioned Mr. -- or Sergeant</p> <p>6 Biebel and then later on Biebel's brother, did you</p> <p>7 know anything about Mr. -- Sergeant Biebel?</p> <p>8 A. No. That was about it that he had</p> <p>9 discussed with me. Other than that, I -- I've</p> <p>10 heard other accusations pertaining to -- to the</p> <p>11 other parties, like as far as what the proceedings</p> <p>12 were that had took place during the evidentiary</p> <p>13 hearing.</p> <p>14 Q. But nothing from you, correct?</p> <p>15 A. No.</p> <p>16 Q. Okay. And you also mentioned that when</p> <p>17 you were in front of his house accusing Reynaldo</p> <p>18 Guevara of misconduct, he said that you could talk</p> <p>19 to his sergeant, Mingey; is that correct?</p> <p>20 A. Correct.</p> <p>21 Q. Is that the first time you ever heard</p> <p>22 the name Mingey?</p> <p>23 A. Correct.</p> <p>24 Q. Have you ever met Sergeant Mingey?</p>
<p style="text-align: right;">Page 107</p> <p>1 call?</p> <p>2 Q. Okay. You filed some pro se post-</p> <p>3 conviction motions in both this case and the Baez</p> <p>4 case; is that correct?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Did you ever raise this</p> <p>7 conversation you had with Reynaldo Guevara in any</p> <p>8 of your own filings?</p> <p>9 MS. BONJEAN: Objection to the form and</p> <p>10 foundation of that question.</p> <p>11 MS. HAGY: Join.</p> <p>12 THE WITNESS: No, I didn't. I don't -- like</p> <p>13 I said, I don't have the experience in that type of</p> <p>14 field.</p> <p>15 BY MR. ENGQUIST:</p> <p>16 Q. Okay. Did any of your attorneys ever</p> <p>17 raise this conversation you supposedly had with</p> <p>18 Reynaldo Guevara on a recorded line in any of their</p> <p>19 post-conviction filings?</p> <p>20 MS. HAGY: Foundation.</p> <p>21 MS. BONJEAN: Join.</p> <p>22 THE WITNESS: No.</p> <p>23 BY MR. ENGQUIST:</p> <p>24 Q. After this recorded telephone</p>	<p style="text-align: right;">Page 109</p> <p>1 A. Not that I know of.</p> <p>2 Q. Okay.</p> <p>3 A. I might have to --</p> <p>4 Q. Have you --</p> <p>5 A. -- see him on his face.</p> <p>6 Q. Have you ever seen Sergeant Biebel?</p> <p>7 MS. BONJEAN: Let's him finish. He didn't</p> <p>8 finish the last part of his -- did you catch that,</p> <p>9 Ms. Court Reporter?</p> <p>10 THE COURT REPORTER: If he could repeat, make</p> <p>11 sure I get --</p> <p>12 MS. BONJEAN: He --</p> <p>13 THE WITNESS: I said I --</p> <p>14 MS. BONJEAN: Go ahead, go ahead. Whatever</p> <p>15 you --</p> <p>16 THE WITNESS: Not that I know of. I might</p> <p>17 have to see him by face if anything.</p> <p>18 BY MR. ENGQUIST:</p> <p>19 Q. Have you ever seen a photograph of</p> <p>20 Sergeant Mingey?</p> <p>21 A. Nobody's never, as far as I know of,</p> <p>22 showed me and pointed out that that's Mingey.</p> <p>23 Q. Okay. As far as you know, have you</p> <p>24 ever met Sergeant Biebel?</p>

<p style="text-align: right;">Page 110</p> <p>1 A. As far as Biebel, if anything, it would 2 have been taken place in -- when I was incarcerated 3 when Guevara picked me up. 4 Q. You mean after your arrest? 5 A. Yeah. 6 Q. Okay. Do you recall ever -- ever 7 dealing with any sergeants when you were at Area 5 8 after your arrest? 9 A. If I ever had any dealings with them? 10 Q. Yes. Any sergeants in Area 5. 11 A. No. 12 Q. All right. Do you know Carlos Olan is? 13 A. I -- I probably met him a few times, 14 but I really don't know him. 15 Q. Okay. Do you remember what his 16 nickname was? 17 A. I believe it was Popeye. 18 Q. Okay. Was he also an Insane Dragon? 19 A. Back then, yes. 20 Q. And when you said you "probably met him 21 a few times," where would you have met him? 22 A. Around Fairfield and Augusta. 23 Q. Okay. Were you aware that he was 24 killed back in 1994?</p>	<p style="text-align: right;">Page 112</p> <p>1 arrests? 2 A. No. 3 Q. Okay. Was Reynaldo Guevara involved in 4 any of those arrests? 5 A. No. 6 MS. BONJEAN: Objection, foundation. How 7 would he know? 8 MS. HAGY: Join. 9 BY MR. ENGQUIST: 10 Q. Do you recall any detectives being 11 involved in either of those arrests? 12 MS. HAGY: Objection, foundation. 13 MS. BONJEAN: Join. 14 THE WITNESS: The only -- the only officers, 15 they were just regular beat officers, that I know 16 of. 17 MR. ENGQUIST: Okay. All right. I'm going 18 to share a screen. 19 What exhibit number are we on, 20 Ms. Court Reporter? 21 THE COURT REPORTER: 4. 22 BY MR. ENGQUIST: 23 Q. Okay. So this will be Exhibit 24 Number 4. If I can get this to work. There we go.</p>
<p style="text-align: right;">Page 111</p> <p>1 A. I found out when I was incarcerated. 2 Q. Prior to your arrest in 1994 by 3 Detective Guevara, had you ever been arrested 4 before by the Chicago Police Department? 5 A. Yes. 6 Q. How many times? 7 A. If I recall correctly, I believe it was 8 twice. 9 Q. And what was it for? 10 A. Auto theft. 11 Q. What happened with -- are they both 12 auto theft charges? 13 A. Yes. 14 Q. And do you recall what happened with 15 those cases? 16 MS. HAGY: Objection; form, foundation, 17 relevancy. 18 MS. BONJEAN: Yeah. I'm going to join that 19 objection. 20 THE WITNESS: It was based on -- I believe I 21 got probation for it. 22 BY MR. ENGQUIST: 23 Q. And do you remember the officers that 24 were involved in either one of those auto theft</p>	<p style="text-align: right;">Page 113</p> <p>1 This is the Bate stamped CCSAO I 2 think 2019 -- or 219 and 220, I believe are the 3 numbers. 4 Sir, can you see this on the screen? 5 A. Yes. 6 Q. Okay. This is for a -- it looks like a 7 March 9th, 1991, vehicle theft case report and it 8 has your name on it. You see that? 9 A. Yes. 10 Q. Okay. Is that one of the incidents you 11 were talking about, sir? 12 A. It looks familiar, yes. 13 Q. Okay. Do you remember who the other 14 offenders were in this case? 15 A. No. 16 Q. Okay. And it has you down as Offender 17 Number 3. 18 Do you remember driving the car at 19 the time, sir? 20 A. I just got -- I just got to see which 21 one. I don't want to give you the wrong -- but I 22 believe -- I believe I was driving the car. 23 Q. Okay. All right. Now, we have a 24 couple officers here on the bottom where it says</p>

<p style="text-align: right;">Page 114</p> <p>1 Reporting Officer's Name. Can you see that? I'm 2 not sure how big it is on your screen. 3 A. Is that this one? 4 Q. I'm not sure if I can highlight. It's 5 where I have the blue. 6 A. Yeah, I -- I see it. 7 Q. Okay. It looks like a -- I think a 8 Barth. I'm not quite sure. And a Cusack. And I'm 9 not even going try the third one. 10 A. Cacioppo. 11 Q. Cacioppo? 12 A. Yeah, could be Cacioppo. 13 Q. Do you remember any of those officers? 14 A. No. If this was the one that happened 15 on Augusta, I -- I wasn't -- I didn't even drive 16 the car. It was just standing there. Some people 17 called and said that I was trying to break into the 18 car. 19 Q. Okay. Waiting for my computer to 20 respond. 21 Exhibit No. 5 this would be CCSAO 22 225 and I think 226. It's a case report from July 23 19th, 1991, 07/19/1991 Case Report which is after 24 the one we were just looking at, which was a March.</p>	<p style="text-align: right;">Page 116</p> <p>1 driving? 2 A. It sounds -- it looks the exact match. 3 It was a gray Toyota Corolla. 4 Q. Okay. 5 A. Yeah. 6 Q. All right. And do you know the 7 officers that were involved in this case? 8 A. No. 9 Q. Okay. There we go. This will be 10 Exhibit No. 5. 11 THE COURT REPORTER: 6. 12 MR. ENGQUIST: Oh, 6. I'm sorry. 13 BY MR. ENGQUIST: 14 Q. And this is from November of 1992. 15 It's for vehicle theft. And this is a gray Toyota. 16 Is this the gray Toyota you were 17 just speaking about? 18 A. It's -- whichever it is, it's one of 19 them that I was trying to explain that I was by 20 Pulaski and close by Armitage and -- 21 Q. I'm not sure if we can -- here it is. 22 I'm sorry. I wasn't sure I hit the share button 23 correctly. 24 Can you see that?</p>
<p style="text-align: right;">Page 115</p> <p>1 A. Yeah. 2 Q. It has your name on it as one of the 3 offenders. You see that, sir? 4 A. Yes. 5 Q. Okay. If you have a chance, you can 6 read the -- read the summary below. I want to see 7 if that refreshes your recollection. 8 Okay. Let me know when you want me 9 to move to the next page. 10 A. You can move to the next one. 11 All right. Next. 12 Q. There's not another page. 13 A. Okay. 14 Q. Okay. Is this the situation you were 15 talking about where you said you were standing by a 16 car and they said you were standing by a car and 17 they said you were attempting to break in it or 18 going to? 19 A. No. This is the one that -- if I 20 recall correctly, this is the gray car. I was -- I 21 was driving in a gray Toyota and they apprehended 22 me -- they apprehended me on Fullerton and Central 23 Park. 24 Q. Okay. And is this a car you were</p>	<p style="text-align: right;">Page 117</p> <p>1 A. Yeah. 2 MS. BONJEAN: I'm sorry. What's the Bates 3 stamp for that? 4 MR. ENGQUIST: Sure. It's CCSAO 221 and 222. 5 MS. BONJEAN: Is that the one we already did? 6 MR. ENGQUIST: No. 7 MS. BONJEAN: Okay. 8 MR. ENGQUIST: The one we already did was 219 9 and 220, and then we did a case report after that. 10 MS. BONJEAN: Thank you. 11 THE WITNESS: Yeah. This looks like the one 12 that I was explaining to you. 13 BY MR. ENGQUIST: 14 Q. Okay. So this is one's like the gray 15 Toyota one that you said you were caught driving? 16 A. Yes. 17 Q. Okay. Do you recall who was with you 18 on any of these occasions, the three occasions we 19 just went through? 20 A. No. 21 Q. Okay. Without knowing who they are 22 exactly, can you tell me whether or not they were 23 members of the Insane Dragons? 24 A. No. I wouldn't -- I wouldn't know, to</p>

<p style="text-align: right;">Page 118</p> <p>1 be honest.</p> <p>2 Q. Okay. Other than those auto thefts,</p> <p>3 can you recall any other times that you were</p> <p>4 arrested by Chicago police?</p> <p>5 A. No. That about it.</p> <p>6 Q. About it or it?</p> <p>7 A. Well besides everything of my</p> <p>8 testimony, that's about it.</p> <p>9 Q. Okay. Did you ever get arrested by any</p> <p>10 other agencies other than Chicago Police</p> <p>11 Department?</p> <p>12 A. No.</p> <p>13 Q. Okay. Now, earlier you said you</p> <p>14 thought you learned of Carlos Olan's murder, it was</p> <p>15 after you were incarcerated, you said?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Did you learn it -- I'm sorry.</p> <p>18 Did -- when you say "incarcerated," I have a</p> <p>19 different term. Was it after your arrest but</p> <p>20 before you were in Cook County Jail or was it after</p> <p>21 you were in Cook County Jail?</p> <p>22 A. It was once I was charged for the case</p> <p>23 and while I was in Cook County Jail.</p> <p>24 Q. Okay. All right. Now, when you were</p>	<p style="text-align: right;">Page 120</p> <p>1 people in the car that -- that pulled you over?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Do you remember a Detective</p> <p>4 Troken?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And who is Detective Troken?</p> <p>7 A. I just know he was the detective that</p> <p>8 was also there. But as far as I know, they was</p> <p>9 saying that it was Polinski, but I really don't</p> <p>10 know.</p> <p>11 Q. Okay. Do you remember two gang crime</p> <p>12 specialists also being present during your arrest?</p> <p>13 A. No.</p> <p>14 Q. Okay. Do you know a gang crimes</p> <p>15 specialist by the name of Rodriguez?</p> <p>16 A. No.</p> <p>17 Q. How about Wiora?</p> <p>18 A. No.</p> <p>19 Q. And how many days after your</p> <p>20 confrontation with Rey in front of his house was it</p> <p>21 that you were arrested?</p> <p>22 A. It was matter of days. I would say</p> <p>23 maybe -- I will say -- estimate like five days.</p> <p>24 Q. And in between the time that you</p>
<p style="text-align: right;">Page 119</p> <p>1 arrested in this case, what I'm talking about, I'm</p> <p>2 talking about the Amos Merkes -- Amy Merkes and</p> <p>3 Jorge Rodriguez murder and the attempted murder of</p> <p>4 Jackie Grande. That's the case I'm speaking of.</p> <p>5 A. Okay.</p> <p>6 Q. Do you recall what day it was that you</p> <p>7 were arrested?</p> <p>8 A. If I recall correctly, I think it was</p> <p>9 on a Thursday. I'm not too sure.</p> <p>10 Q. Would December 12th be -- sound correct</p> <p>11 to you?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And where were you when you were</p> <p>14 arrested?</p> <p>15 A. When I was arrested, I was going home.</p> <p>16 Detective Guevara grabbed me on Spaulding, like the</p> <p>17 next block of Belle Plaine. And he had --</p> <p>18 Halvorsen was there and I believe the other</p> <p>19 detective was Polinski (phonetic).</p> <p>20 Q. Is who?</p> <p>21 A. I think it was Polinski. I'm not sure.</p> <p>22 Q. Polinski?</p> <p>23 A. I think so. I'm not sure.</p> <p>24 Q. Okay. So you had -- there were three</p>	<p style="text-align: right;">Page 121</p> <p>1 confronted Reynaldo Guevara at his home and up</p> <p>2 until the arrest, did you see Reynaldo Guevara</p> <p>3 at all?</p> <p>4 A. After that?</p> <p>5 Q. Between the time that you confront him</p> <p>6 at his house and you said approximately five or so</p> <p>7 days later that you were arrested, during that</p> <p>8 period of time, did you see Reynaldo Guevara at</p> <p>9 all?</p> <p>10 A. Just at the court hearings. And</p> <p>11 then, of course, you know, when I was picked up for</p> <p>12 the -- for the crime.</p> <p>13 Q. Yeah. I'm -- let me go back and see if</p> <p>14 we can get this a little -- you had the</p> <p>15 confrontation with Reynaldo Guevara, you said, at</p> <p>16 his home, correct?</p> <p>17 A. Correct.</p> <p>18 Q. And then you said somewhere</p> <p>19 approximately five days later is when you were</p> <p>20 arrested, correct?</p> <p>21 A. Yeah.</p> <p>22 Q. By Reynaldo Guevara?</p> <p>23 A. Correct.</p> <p>24 Q. Okay. In between the time you were at</p>

<p style="text-align: right;">Page 122</p> <p>1 his house having the confrontation and the time you 2 were arrested, during those five or so days, did 3 you see Reynaldo Guevara at all? 4 A. No. 5 Q. Okay. Did you see any -- did you have 6 contact with any police officers at all? 7 A. No. 8 Q. Okay. Now, you said -- you talked 9 about Detective Halvorsen. Was he present at the 10 location when you were arrested? 11 A. Yes. 12 Q. Okay. Can you describe him? 13 A. He has like pushed black -- pushed-back 14 hair. It looked like kind of like a grayish like, 15 but it was dark outside. He has glasses. 16 But he was the driver. Guevara was 17 in the passenger side when they picked me up and 18 then the other gentleman was sitting next to me. 19 Q. Okay. Did you have any conversations 20 with Halvorsen? 21 A. No. 22 Q. Conversations at any time, either in 23 the car or at the station? 24 A. No.</p>	<p style="text-align: right;">Page 124</p> <p>1 told me, he says: Don't say anything; he's going 2 to try to talk to you, but just talk to me. But 3 he -- he just -- the only one of that was -- 4 majority talking through was just Guevara. 5 Q. Okay. And do you tell Detective 6 Guevara that you had nothing to do with the murder 7 of Amy Merkes and Jorge Rodriguez? 8 A. Correct. 9 Q. Okay. And do you recall going in -- 10 being put into any kinds of lineups? 11 A. Yes. Mr. Guevara, during our -- while 12 I was being interrogated, Guevara stated that if 13 you don't get picked out through the lineup, then 14 you're free to go, you have nothing to worry about. 15 Q. And do you know how many lineups you 16 were in? 17 A. Just that one. 18 Q. When you say "just that one," do you -- 19 were you told to stand up or told to move more than 20 once or was it just that one time you remember 21 being back into that room? 22 MS. BONJEAN: Objection to the form and 23 foundation of that question. 24 THE WITNESS: It was based on the -- just</p>
<p style="text-align: right;">Page 123</p> <p>1 Q. And the officer who was sitting next to 2 you in the back, did you have any conversations 3 with that officer? 4 A. No. 5 Q. Is it fair to say the only officer you 6 had conversations with, either at the scene of your 7 arrest or at the police station, was Detective 8 Guevara? 9 A. Yes. Even in the car, I was trying to 10 figure out why was I being arrested for, he just 11 said it has to deal with your mother. 12 Q. Did the "has to deal with your mother," 13 was that before or after you got into the police 14 car? 15 A. Once I was inside the police car. 16 Q. Okay. And once you were at the police 17 station, you only spoke to Reynaldo Guevara, 18 correct, as -- 19 A. Once I was at the police station, I 20 talked to Guevara. Guevara was the only one doing 21 the interrogation. He just informed me there's 22 going to be a state attorney that's going to be 23 coming in. He just told me, he says, Don't say 24 anything. Which kind of blew my mind. But he just</p>	<p style="text-align: right;">Page 125</p> <p>1 for pertaining to this case, for the Guevara 2 incident with Merkes and Mr. Rodriguez. 3 As far as I recall, it was just that 4 one time that he just said, Go to -- you're going 5 to be, you know, into the lineup, and that was it. 6 BY MR. ENGQUIST: 7 Q. Okay. Do you -- do you have any idea 8 how many witnesses viewed the lineup? 9 MS. HAGY: Objection. 10 MS. BONJEAN: Objection. 11 MS. HAGY: Form and foundation. 12 MS. BONJEAN: Yeah. Joining the objection. 13 THE WITNESS: I wouldn't even know. 14 BY MR. ENGQUIST: 15 Q. Okay. And when you were at that 16 lineup, did you know anybody that was in the 17 lineup with you? 18 A. Just the only one that I recognized, if 19 anything, was Mr. Almodovar. 20 Q. And did you speak with Mr. Almodovar at 21 all while you were at the police station that 22 night? 23 MS. BONJEAN: Objection, foundation. 24 THE WITNESS: No.</p>

<p style="text-align: right;">Page 126</p> <p>1 BY MR. ENGQUIST:</p> <p>2 Q. Can you describe the room you were in</p> <p>3 when the lineup was taking place?</p> <p>4 A. It was -- it was more like -- it has a</p> <p>5 glass -- like a glass frame, like a -- of a two-way</p> <p>6 mirror, I would say. They had chairs in the back.</p> <p>7 We would just lineup, you know, sit down, things</p> <p>8 like that. But that was about it. It was just</p> <p>9 like a solid just a square room. It was -- looked</p> <p>10 like one way in, one way out.</p> <p>11 Q. And when you were in that room, was</p> <p>12 there any -- was there anybody from -- any police</p> <p>13 officer in that room with you and the other</p> <p>14 participants of the lineup?</p> <p>15 A. Just -- if anything, it was just</p> <p>16 standing on a door.</p> <p>17 Q. Okay. And do you remember the officer</p> <p>18 who was standing in the door?</p> <p>19 A. No.</p> <p>20 Q. Okay. Do you recall your photograph</p> <p>21 being taken after the lineup?</p> <p>22 A. Yes.</p> <p>23 Q. So what happened after the lineup; do</p> <p>24 you recall?</p>	<p style="text-align: right;">Page 128</p> <p>1 Once the state attorney comes in, he's going to try</p> <p>2 to ask you some questions, just -- just say you</p> <p>3 don't know or just, you know, don't say anything.</p> <p>4 State attorney came in, into the</p> <p>5 room, and he tried to talk to me, and I just told</p> <p>6 him, I have nothing to say. You know, so he just</p> <p>7 said, Well, you're -- you're going down for this.</p> <p>8 Q. Okay. Do you remember any of the</p> <p>9 questions the state's attorney tried to ask you</p> <p>10 before you said you had nothing to say?</p> <p>11 A. He was just engaging as far as like,</p> <p>12 I would like to talk to you about what happened</p> <p>13 September 1st, 1994. But I said, I have nothing to</p> <p>14 talk about; I want to see my attorney. So I just</p> <p>15 went off from there. He seemed like he got upset</p> <p>16 and he said, You're just -- you're going to go down</p> <p>17 for this.</p> <p>18 Q. Okay. Earlier you were saying Reynaldo</p> <p>19 Guevara was saying, you know, not to talk to the</p> <p>20 state's attorney. Is that the reason why you asked</p> <p>21 for your -- your own attorney or is there some</p> <p>22 other reason why?</p> <p>23 MS. BONJEAN: I'm going to object to it</p> <p>24 mischaracterizes what he said, or at least only</p>
<p style="text-align: right;">Page 127</p> <p>1 A. As far as I recall, I was like taken</p> <p>2 downstairs into just a holding room until I guess</p> <p>3 I get processed.</p> <p>4 Q. When you say "downstairs," you went to</p> <p>5 the lockup area?</p> <p>6 A. Correct.</p> <p>7 Q. You said a "holding room." Was it like</p> <p>8 a big, open, holding cell?</p> <p>9 A. No.</p> <p>10 Are you talking about the lineup</p> <p>11 or --</p> <p>12 Q. You said after the lineup, you went</p> <p>13 downstairs to a holding --</p> <p>14 A. Oh, yes.</p> <p>15 Q. -- area.</p> <p>16 A. It was like -- well, they're kind</p> <p>17 of -- to me they're kind of big. So they have</p> <p>18 different -- different cages, different rooms.</p> <p>19 so to me it was like it kind of big, so that's</p> <p>20 what I mean by like one, big holding room.</p> <p>21 Q. Okay. At some point, do you remember</p> <p>22 speaking at all to an assistant state's attorney?</p> <p>23 A. The state attorney, yes. When -- as I</p> <p>24 was discussing with you, when he -- Guevara said,</p>	<p style="text-align: right;">Page 129</p> <p>1 partially characterizes what he said in his prior</p> <p>2 testimony on that.</p> <p>3 MS. HAGY: Join.</p> <p>4 BY MR. ENGQUIST:</p> <p>5 Q. Go ahead, sir.</p> <p>6 A. I really didn't know as to why he -- he</p> <p>7 told me something like that. I believe, my</p> <p>8 personal opinion, he was just trying to gain some</p> <p>9 type of trust with him. Maybe that was his tactic</p> <p>10 of -- of just playing devil's advocate and just</p> <p>11 making it seem, Trust in me, not an attorney, to</p> <p>12 get some type of agreements or bond in hopes that I</p> <p>13 would open up to him. And that's the only thing</p> <p>14 that I could think of.</p> <p>15 Q. Okay. My question is a little bit</p> <p>16 different.</p> <p>17 Because what you say Reynaldo</p> <p>18 Guevara said to you about whether or not to talk to</p> <p>19 the state's attorney, is that the reason why you</p> <p>20 refused to talk to the states state's attorney?</p> <p>21 MS. HAGY: Objection; mischaracterizes</p> <p>22 testimony, foundation.</p> <p>23 MS. BONJEAN: Join.</p> <p>24 THE WITNESS: No. I -- I just didn't want to</p>

<p style="text-align: right;">Page 130</p> <p>1 talk them because I really didn't trust too much of 2 what was going on at that department based on what 3 I had explained before. 4 BY MR. ENGQUIST: 5 Q. And I'm -- I'm sorry if I -- you're 6 going to repeat yourself on something that I 7 missed, but you said you heard things about the 8 department, you didn't trust the department. Are 9 talking about you didn't trust the state's 10 attorney's office? 11 A. I didn't trust people that were working 12 inside there due to what I had stated before in 13 regards to when I went to his house and I made 14 the -- the outburst to the gentleman that lived 15 next door of people that he would know in that 16 department. So I really didn't really trust too 17 many people that worked in that department. 18 Q. Okay. This conversation or this quick 19 conversation you had with the assistant state's 20 attorney, was that before or after you went 21 downstairs to the lockup area? 22 A. It was before I went to the lockup 23 area, yes. 24 Q. After you went to the lockup area,</p>	<p style="text-align: right;">Page 132</p> <p>1 Q. Did he threaten you? 2 A. No. Not at that time. 3 MS. BONJEAN: Objection -- yeah, to the 4 foundation of that, but -- but he provided it. 5 BY MR. ENGQUIST: 6 Q. Would it be fair to say that after you 7 were charged, after you went to the lockup, were 8 charged, the next time you spoke with anybody about 9 this case would have been after you were in 10 court -- after you were sent over to Cook County 11 Jail, I mean? 12 MS. HAGY: Objection; form, foundation. 13 MS. BONJEAN: Join. 14 THE WITNESS: Yes. 15 BY MR. ENGQUIST: 16 Q. Okay. During -- prior to and during 17 your criminal trial, did you ever inform anybody of 18 the confrontation you had with Reynaldo Guevara 19 outside his home? 20 MS. BONJEAN: Objection, asked and answered. 21 THE WITNESS: Say it again. 22 BY MR. ENGQUIST: 23 Q. I'll just make it simpler. 24 Did you ever inform any of your</p>
<p style="text-align: right;">Page 131</p> <p>1 did you come -- did you ever come back upstairs to 2 the -- to the area to be questioned again or talked 3 to again or did you just stay in the lockup area? 4 A. No. As Detective Guevara stated, once 5 I was identified, that I will be charged. So once 6 I was in the lockup area, I was soon to be 7 transported. 8 Q. To Cook County Jail? 9 A. Correct. 10 Q. Okay. All right. I just want to make 11 sure I haven't missed anything. 12 You said you spoke with only 13 Reynaldo Guevara at the police department and an 14 assistant state's attorney; is that correct? 15 A. Correct. 16 Q. Okay. When you were talking about 17 when you were speaking with Reynaldo Guevara, 18 you described it -- you described it as an 19 interrogation. 20 Were you ever hit during that time? 21 A. No. Mr. Guevara, he's -- he never hit 22 me. 23 Q. Did he yell at you? 24 A. No. Not at that time.</p>	<p style="text-align: right;">Page 133</p> <p>1 attorneys that you had a confrontation with 2 Reynaldo Guevara outside his home that you 3 described to us today? 4 MS. BONJEAN: Objection. That is -- you're 5 asking him -- you're asking him to disclose a 6 communication. That is improper. 7 MS. HAGY: Join. 8 MR. ENGQUIST: So are you going to instruct 9 him not to answer? 10 MS. HAGY: Yes, I am. 11 Talk don't talk about 12 attorney/client communication. 13 BY MR. ENGQUIST: 14 Q. Do you know if your mother ever talked 15 to your attorneys about your confrontation with 16 Reynaldo Guevara outside of his home? 17 A. I really -- I really wouldn't know. 18 Q. Okay. You told your mother about that, 19 though, didn't you? 20 A. Correct. 21 Q. Did you know whether or not Reynaldo 22 Guevara was ever confronted with these accusations 23 of him framing you in this -- this interaction 24 outside of his home that you described during the</p>

<p style="text-align: right;">Page 134</p> <p>1 criminal trial?</p> <p>2 MS. HAGY: Objection; form, foundation.</p> <p>3 MS. BONJEAN: Join.</p> <p>4 THE WITNESS: As far as I know, no. I</p> <p>5 wouldn't have any knowledge of that.</p> <p>6 MR. ENGQUIST: And just to be clear, Lindsay,</p> <p>7 just so -- because I don't want to go through a</p> <p>8 budge of questions for no reason, you're going to</p> <p>9 maintain attorney/client privilege for any</p> <p>10 communications he had with any of his criminal</p> <p>11 defense attorneys?</p> <p>12 MS. HAGY: Yes, I am.</p> <p>13 MR. ENGQUIST: Okay.</p> <p>14 MS. HAGY: Thank you.</p> <p>15 BY MR. ENGQUIST:</p> <p>16 Q. Now, while you were in the Cook County</p> <p>17 Jail, that's where you met Antonio Guzman; is that</p> <p>18 correct?</p> <p>19 A. Correct.</p> <p>20 Q. And I believe you said -- sorry.</p> <p>21 Haven't got to this yet.</p> <p>22 Did Antonio Guzman have information</p> <p>23 about your murder case, the one involving Amy</p> <p>24 Merkes?</p>	<p style="text-align: right;">Page 136</p> <p>1 A. Based on testimony from Mr. Saez</p> <p>2 stating that he seen the -- a shiny gun and then</p> <p>3 the ballistics saying it was from a .38 caliber.</p> <p>4 Q. So did Mr. Guzman say that he saw a</p> <p>5 shiny, .38 caliber weapon?</p> <p>6 A. Correct. He said he seen a .38 that</p> <p>7 was in the man's vehicle. He said that the</p> <p>8 individual owned that -- that car, that looks</p> <p>9 almost like me. He also seen another weapon that</p> <p>10 was dark that was another .38 that was in the car.</p> <p>11 Q. So Mr. Guzman said that he -- did he</p> <p>12 indicate that he knew the person who owned the car?</p> <p>13 A. He -- Mr. Guzman was just stating that</p> <p>14 he knew these individuals, but according to him</p> <p>15 when I asked him if he actually knew them-knew</p> <p>16 them, he says that, I just know them as being</p> <p>17 Cobras.</p> <p>18 Q. Okay. And if I remember correctly, you</p> <p>19 told me that Antonio Guzman, your understanding, he</p> <p>20 was a Spanish Cobra as well, correct?</p> <p>21 A. Correct.</p> <p>22 Q. Okay. Did you ever convey this</p> <p>23 information that there was a witness in Cook County</p> <p>24 Jail who had -- who had information about your case</p>
<p style="text-align: right;">Page 135</p> <p>1 A. Yes. He was describing the -- the</p> <p>2 case. I've never explained to him the exact</p> <p>3 details, but he -- he described the kind of car,</p> <p>4 weapons that he had seen, and description of</p> <p>5 individuals that look almost just -- according to</p> <p>6 him, one looked like me and the other one could</p> <p>7 pass as my co-defendant, Roberto Almodovar.</p> <p>8 Q. Okay. And what did he tell you -- now,</p> <p>9 when he described this case, how did he say he had</p> <p>10 this knowledge?</p> <p>11 A. He said that he had seen the car</p> <p>12 that -- from his area, it wasn't too far from where</p> <p>13 the crime had happened at. Since the case was</p> <p>14 lingering around through the media, I'm assuming he</p> <p>15 got the information like as far as where exactly it</p> <p>16 happened. But he was describing it that -- you</p> <p>17 know, that he knew that we didn't do it, that these</p> <p>18 two individuals looked like us, and the</p> <p>19 descriptions of the weapons that basically matched</p> <p>20 the crime, and which, in my recollection it was</p> <p>21 never, you know, stated through the media, the</p> <p>22 descriptions of the weapons, that I could recall.</p> <p>23 Q. And what -- what was specific about the</p> <p>24 weapons which drew your attention?</p>	<p style="text-align: right;">Page 137</p> <p>1 to anyone?</p> <p>2 MS. BONJEAN: Objection, foundation.</p> <p>3 THE WITNESS: As far as outside, no. Just as</p> <p>4 far as just only my mother. Her and I, we</p> <p>5 discussed it.</p> <p>6 MS. BONJEAN: I'm going to object again to</p> <p>7 the extent you're asking for -- I mean, I think</p> <p>8 Lindsay did, but I assume you're not asking for</p> <p>9 attorney/client communications, right?</p> <p>10 MR. ENGQUIST: I'm assuming that's why he</p> <p>11 looked over to her and -- and he said besides --</p> <p>12 MS. BONJEAN: I was -- listen. My screen was</p> <p>13 small. I couldn't see anything. I had to open up</p> <p>14 the screen. So I apologize if that's what</p> <p>15 happened.</p> <p>16 MR. ENGQUIST: Okay. Let's just make it</p> <p>17 clear then.</p> <p>18 I'm assuming, Ms. Hagy, you're</p> <p>19 instructing him not to answer to the extent that it</p> <p>20 would call for any communications he had with his</p> <p>21 attorneys, correct?</p> <p>22 MS. HAGY: Yes, I am.</p> <p>23 BY MR. ENGQUIST:</p> <p>24 Q. Okay. When's the last time you</p>

<p style="text-align: right;">Page 138</p> <p>1 spoke -- you -- I'm sorry. You said you kept in 2 contact with Antonio Guzman, correct? 3 A. Yes. When I was -- when I was 4 released. 5 Q. Okay. Do you have his phone number? 6 A. I have to look it up in my phone. 7 Q. Can you look it up for me and tell me 8 what it is? 9 MS. BONJEAN: You're going to have him do an 10 investigation into his phone right now? 11 MR. ENGQUIST: I'm just having him look to 12 see if he can give me his phone number. I wouldn't 13 call that really an investigation. 14 MS. BONJEAN: Well ... 15 THE WITNESS: It's 716.529.7661. 16 MS. BONJEAN: Should we all call him right 17 now too? 18 MR. ENGQUIST: Maybe you can do that off the 19 record, just not in the dep yet. 20 MS. BONJEAN: Well, I'm sure you'll issue a 21 subpoena one day before discovery closes, which is 22 your methodology. 23 MR. ENGQUIST: Well, considering I didn't 24 have any information about Mr. Guzman being the</p>	<p style="text-align: right;">Page 140</p> <p>1 sentenced in both murder cases, correct? 2 A. Correct. 3 Q. Okay. And it was after the sentencing 4 and the Baez case that you went to IDOC, correct? 5 A. Yes, correct. 6 Q. Okay. All right. We talked a little 7 bit in a broad sense when you were talking about 8 things that you did while you were in IDOC, but I 9 just want to go through that in a little more 10 detail. 11 Where were you housed in IDOC? What 12 facilities? 13 MS. HAGY: Objection. 14 THE WITNESS: I used to be in Menard 15 Correctional, Stateville, Joliet, and Pontiac, and 16 Dixon. 17 THE COURT REPORTER: I'm sorry. I missed 18 your objection before he answered. 19 MS. HAGY: Oh, form. 20 THE COURT REPORTER: Thank you. 21 BY MR. ENGQUIST: 22 Q. Okay. And where were you at first, 23 which was the first place? 24 A. Joliet.</p>
<p style="text-align: right;">Page 139</p> <p>1 witness here, I didn't have any contact with him or 2 a lot of the story until now. Yeah, I might be 3 changing a few things around. 4 MS. BONJEAN: You've -- you've been talking 5 about Antonio Guzman for these years. I don't know 6 what you're talking about. All I ever hear is 7 about Baby Jaws and Antonio Guzman, so yeah, you -- 8 you did know about him. 9 BY MR. ENGQUIST: 10 Q. Okay. Have you ever talked to Antonio 11 Guzman about being a witness in this case? 12 A. No. 13 Q. Do you know if your attorneys ever got 14 in any contact with him? 15 MS. HAGY: I'm going to instruct him not to 16 answer about attorney/client communication. 17 MS. BONJEAN: And work product privilege. 18 Sorry, Lindsay. 19 MS. HAGY: No, I appreciate it. 20 BY MR. ENGQUIST: 21 Q. Did you testify at all or give 22 testimony at all in the Merkes murder case? 23 A. No. 24 Q. All right. Now, sir, you were</p>	<p style="text-align: right;">Page 141</p> <p>1 Q. And how long were you there? 2 A. I was just there about -- I'll estimate 3 maybe about a month or less. 4 Q. Okay. Where were you at next? 5 A. The next one I want to was Pontiac. 6 Q. And do you remember what years you were 7 at Pontiac? 8 A. If I recall correctly, I think it was 9 around from '98 -- '97 to '98. 10 Q. Okay. And do you remember who your 11 cellmate was or cellmates were at Pontiac? 12 A. I had -- there were about like 13 different nicknames we used to call them. I had 14 one that was June Bug. And I had another one they 15 used to call him Bodiqua (phonetic) when I was in 16 Pontiac. This other guy I didn't -- I didn't know 17 his name. They just call him White Boy. The other 18 one, it was some -- some guy; they used to call him 19 Soul. And then I was with some other guy named 20 Bam. 21 Q. Okay. Do you know whether June Bug 22 belonged to a gang? 23 A. I believe -- 24 MS. HAGY: Objection; form, foundation.</p>

<p style="text-align: right;">Page 142</p> <p>1 BY MR. ENGQUIST:</p> <p>2 Q. Go ahead.</p> <p>3 A. I believe he was a Maniac Latin</p> <p>4 Disciple.</p> <p>5 Q. Okay. And where were you after</p> <p>6 Pontiac?</p> <p>7 A. After Pontiac I was sent to Stateville.</p> <p>8 Q. And how long were you at Stateville?</p> <p>9 A. I left Stateville in 2000.</p> <p>10 Q. So '98 to 2000 roughly?</p> <p>11 A. Yes.</p> <p>12 Q. And do you remember any of your</p> <p>13 cellmates there?</p> <p>14 A. Oh, wow. A guy by the name of Walter</p> <p>15 Primus was my celly. I had -- I had so many. The</p> <p>16 other one was a guy by the name of Stone, that was</p> <p>17 his name. Another guy named Mohammed. And then</p> <p>18 there was another guy. I can't think of his name.</p> <p>19 I believe his name was Memo.</p> <p>20 Q. Okay. And where did you go after</p> <p>21 Stateville?</p> <p>22 A. After Stateville, I was sent to Pontiac</p> <p>23 again.</p> <p>24 Q. Okay. And from when to when?</p>	<p style="text-align: right;">Page 144</p> <p>1 recall correctly. I believe it was the 5th of</p> <p>2 2018.</p> <p>3 Q. Okay. During any of the time that you</p> <p>4 were at IDOC, were you ever in the same facility as</p> <p>5 your co-plaintiff here, Mr. Almodovar?</p> <p>6 A. Say again.</p> <p>7 Q. Were you ever housed in the same</p> <p>8 facility as Mr. Almodovar?</p> <p>9 A. Are you referring to Roberto?</p> <p>10 Q. Yes.</p> <p>11 A. Not in Dixon, no.</p> <p>12 Q. At any of the institutions?</p> <p>13 A. We were at Menard, but not in the same</p> <p>14 housing unit.</p> <p>15 Q. And how did you know that he was there?</p> <p>16 A. There was individuals that had informed</p> <p>17 me.</p> <p>18 Q. Okay. And when I said Almodovar, you</p> <p>19 wanted me to specify which one.</p> <p>20 Were you ever housed with any other</p> <p>21 of Mr. Almodovar's relatives?</p> <p>22 A. I was with Edwin Almodovar in Dixon.</p> <p>23 Q. Now, we already went through different</p> <p>24 jobs that you had when you were at the IDOC.</p>
<p style="text-align: right;">Page 143</p> <p>1 A. I was sent to Pontiac in -- like I</p> <p>2 said, in 2000, and then I had went to Menard around</p> <p>3 2013, I believe.</p> <p>4 Q. So you spent from 2000 to 2013 at</p> <p>5 Pontiac and then you went to Menard?</p> <p>6 A. Yes.</p> <p>7 Q. And how long were you at Menard?</p> <p>8 A. I would say maybe like three months,</p> <p>9 estimate.</p> <p>10 Q. And then where did you go from there?</p> <p>11 A. Back to Pontiac.</p> <p>12 Q. Okay. And then how long were you at</p> <p>13 Pontiac then?</p> <p>14 A. Until the -- the case was resolved</p> <p>15 from both of them. And that was like December of</p> <p>16 2000, I want to say, '18.</p> <p>17 Q. Okay. You said Dixon earlier. Was</p> <p>18 that incorrect?</p> <p>19 A. No. Dixon, yeah. I went to Dixon</p> <p>20 after Pontiac, went I went to Pontiac again after</p> <p>21 Menard.</p> <p>22 Q. And when were you at Dixon?</p> <p>23 A. I was at Dixon until my release, up</p> <p>24 till September. I went to Dixon in December, if I</p>	<p style="text-align: right;">Page 145</p> <p>1 Did we -- earlier, did we cover all</p> <p>2 of those?</p> <p>3 A. I think so. Depends on you.</p> <p>4 MS. BONJEAN: You want him -- you want him to</p> <p>5 do your job for your, Josh?</p> <p>6 MR. ENGQUIST: Is that an objection or just a</p> <p>7 snide comment?</p> <p>8 MS. BONJEAN: Just a -- just a snide comment.</p> <p>9 MR. ENGQUIST: Snide comment. There we go.</p> <p>10 BY MR. ENGQUIST:</p> <p>11 Q. So why don't we go through it then.</p> <p>12 Why don't you tell me the different jobs you had in</p> <p>13 IDOC.</p> <p>14 A. When I was in IDOC, majority I worked</p> <p>15 inside the kitchens when I was housed there.</p> <p>16 Q. Okay. Any other job besides kitchen</p> <p>17 worker?</p> <p>18 A. Yes. I used to work the laundry</p> <p>19 department and the general store.</p> <p>20 Q. Anything else?</p> <p>21 A. As far as I recall, no.</p> <p>22 Oh, one more. Sorry. In Dixon</p> <p>23 before I was released I was working outside</p> <p>24 grounds.</p>

<p style="text-align: right;">Page 146</p> <p>1 Q. During the years you were in IDOC --</p> <p>2 actually, go back.</p> <p>3 Do you know the time that you were</p> <p>4 in Cook County Jail, did you ever suffer any kind</p> <p>5 of physical injuries?</p> <p>6 A. Not in Cook County Jail, no.</p> <p>7 Q. During the time you were in IDOC, did</p> <p>8 you ever suffer any kind of physical injuries?</p> <p>9 A. Yes.</p> <p>10 Q. And what was -- what were those?</p> <p>11 A. I had my leg broken and my collarbone,</p> <p>12 my left-side collarbone, hairline fracture.</p> <p>13 Q. You said left collarbone?</p> <p>14 A. Yes.</p> <p>15 Q. And when did that happen?</p> <p>16 A. That was around when I was in</p> <p>17 Stateville. I was jumped getting -- going to see</p> <p>18 my -- my mother.</p> <p>19 Q. Do you remember what year this would</p> <p>20 have been?</p> <p>21 A. It was roughly around 1999 to 2000.</p> <p>22 Q. Okay. And you said you were jumped.</p> <p>23 I'm assuming that was by other inmates?</p> <p>24 A. Yeah. It was three individuals. I</p>	<p style="text-align: right;">Page 148</p> <p>1 with those three unknown inmates that jumped you?</p> <p>2 A. No. Not after that, no.</p> <p>3 Q. Any other physical injuries you</p> <p>4 suffered while you were at IDOC?</p> <p>5 A. Besides them jumping on me, no. That's</p> <p>6 about it.</p> <p>7 Q. I'm sorry. Was this the only incident?</p> <p>8 A. No, that -- this was the only incident</p> <p>9 that I could recall.</p> <p>10 Q. While you were at Cook County Jail, did</p> <p>11 you seek any kind of medical help for any kind of</p> <p>12 psychological or emotional problems?</p> <p>13 A. No.</p> <p>14 Q. While you were in IDOC, did you seek</p> <p>15 any kind of mental health treatment?</p> <p>16 A. No.</p> <p>17 Q. And I believe you already talked about</p> <p>18 when you were in IDOC you did seek, several times,</p> <p>19 substance abuse counseling; although, you didn't</p> <p>20 have a substance abuse problem, correct?</p> <p>21 A. Yes, correct. There were programs that</p> <p>22 they were initiating to people who wanted to</p> <p>23 participate, so it was kind of like close to</p> <p>24 vocational.</p>
<p style="text-align: right;">Page 147</p> <p>1 was going to go see my mother and -- and three</p> <p>2 individuals attacked me.</p> <p>3 Q. Do you know who those inmates were?</p> <p>4 A. No.</p> <p>5 Q. Do you know why you were jumped?</p> <p>6 A. No.</p> <p>7 Q. Did you report that at all to the --</p> <p>8 anybody within IDOC?</p> <p>9 A. The staff automatically. I didn't need</p> <p>10 to report it. The -- the officer took it upon</p> <p>11 himself to do whatever he did as far as writing an</p> <p>12 incident report. Beyond that, I have no idea. But</p> <p>13 I -- I received semi like medical assistance.</p> <p>14 Q. You said "semi." What do you mean by</p> <p>15 that?</p> <p>16 A. When the incident occurred, I had -- I</p> <p>17 kind of collapsed on the floor. I couldn't take</p> <p>18 the pain anymore. One of the nurses walked up to</p> <p>19 me when I was on the floor and he just said that,</p> <p>20 you should have just stood down. But other than</p> <p>21 that, he says we're -- we're switching shifts. And</p> <p>22 by that time, they -- they shut down the whole</p> <p>23 facility on lockdown because of the incident.</p> <p>24 Q. Did you have any other interactions</p>	<p style="text-align: right;">Page 149</p> <p>1 Q. Since your release from prison, have</p> <p>2 you sought any kind of treatment for any kind of</p> <p>3 physical problems you think stem from your time in</p> <p>4 prison?</p> <p>5 A. No.</p> <p>6 Q. Since your release from prison, have</p> <p>7 you sought any kind of treatment for any kind of</p> <p>8 mental health -- any kind of mental health</p> <p>9 treatment?</p> <p>10 A. No.</p> <p>11 Q. Do you believe you suffer from any kind</p> <p>12 of mental health problems from your time in prison?</p> <p>13 MS. HAGY: Objection; form, foundation.</p> <p>14 THE WITNESS: I believe that -- based on what</p> <p>15 had happened, I believe I get like sort of like --</p> <p>16 I guess like an anxiety. And sometimes I -- you</p> <p>17 know, I use to get depressed. I couldn't sleep</p> <p>18 when I first came out. It took a little while to</p> <p>19 cope. So as some time went by, things started</p> <p>20 getting better for me.</p> <p>21 BY MR. ENGQUIST:</p> <p>22 Q. And how long before things started</p> <p>23 getting better for you after your release?</p> <p>24 A. It took me about, I'll estimate maybe</p>

<p style="text-align: right;">Page 150</p> <p>1 like maybe four months until I started getting a 2 good sleeping pattern. But when I first came out, 3 I couldn't really sleep. I wasn't really adjusted 4 to how -- comparing to inside and out. 5 Q. And how do you sleep today? 6 A. I sleep a little bit more better, yes. 7 Q. Okay. Have you ever sought any kind of 8 treatment for -- or any kind of help -- I'm sorry. 9 Let me go back. 10 Have you sought any kind of 11 treatment for any kind of sleeping disorders? 12 A. No. 13 Q. You had said you had some -- what you 14 considered some kind of anxiety. 15 Can you describe what that anxiety 16 was like after your release? 17 A. The anxiety was based on trying to 18 cope with society and that. Responsibilities. 19 it was like a big toll on me because I was 20 incarcerated when I was young, didn't have really 21 responsibilities responsibility as being a teen 22 comparing to an adult life of how to get your 23 credit up, et cetera, how to do it. A lot of 24 questions emerged in your head how you're going to</p>	<p style="text-align: right;">Page 152</p> <p>1 based on, you know, as the case, how things were. 2 My mother kind of suffered a lot, you know, based 3 on it. And living with her during the time when I 4 was released, seeing how my grandmother was in her 5 condition. It was -- kind of took an emotional 6 toll. And it took a little while for -- for my -- 7 for my mother to like kind of overcome a little 8 bit of her fears in which -- you know, being 9 incarcerated. 10 Q. And just to be clear, when you were 11 finally released from prison, you were released on 12 the Baez murder, correct? 13 A. Correct. 14 Q. Okay. Was there anything different -- 15 do you believe there was anything different about 16 your time in prison based on the Baez case compared 17 to the Merkes case? 18 MS. HAGY: Objection; form, foundation. 19 THE WITNESS: I believe I guess the 20 difference is that I was exonerated on one and the 21 other one I was -- I'm doing parole on. So I have 22 the conviction on one and the other one I don't. 23 BY MR. ENGQUIST: 24 Q. Okay. But do you believe there's</p>
<p style="text-align: right;">Page 151</p> <p>1 get basically good footing and try to find yourself 2 in society. 3 Q. And have you overcome that anxiety? 4 MS. HAGY: Objection; form, foundation. 5 THE WITNESS: I believe, yeah, majority of 6 it. Yes, I have. But, of course, you know, things 7 continue to get rough in society, so you got to 8 somehow figure out, you know, different obstacles 9 if things are not helping you where you're at at 10 this point. 11 BY MR. ENGQUIST: 12 Q. And when you're talking different 13 obstacles that are coming up now. What -- what are 14 those different obstacles? 15 A. Like, say, for example, taxes go on up. 16 If you want to get a better future, like housing, 17 getting into the housing market, things like that, 18 could you financially, you know, with your salary 19 or do you need to improvise a little bit on a 20 different field to get better pay. So those are 21 the things that I'm inquiring about. 22 Q. Okay. You mentioned some depression 23 after -- after your release. Was that correct? 24 A. Yeah. It was some -- some depression</p>	<p style="text-align: right;">Page 153</p> <p>1 anything different about the time you spent in 2 prison or where you did time or how you did time 3 based on the Merkes murder compared to the Baez 4 murder? 5 MS. BONJEAN: Objection just to the form of 6 that question. 7 If you understand it, you can 8 answer. 9 MS. HAGY: Speculation. 10 THE WITNESS: If -- I believe that I would 11 have been most likely in a -- if I'm correct, if 12 this is what you're asking me, I believe I could 13 have been in a better position and a better 14 penitentiary that could provide additional 15 educational programs than being in a max 16 penitentiary. I could have been in a medium 17 facility or I could have never been incarcerated. 18 BY MR. ENGQUIST: 19 Q. And what did you base that on, that you 20 believe you that might have been at a different -- 21 a medium facility if you were not convict of the 22 Merkes homicide? 23 A. Based on -- based on the testimony of 24 the Baez, the state attorney decided to call</p>

<p style="text-align: right;">Page 154</p> <p>1 Mr. Guevara into the Baez based on his testimony. 2 It was in our opinion that it was just to enhance 3 and to ensure that I received a natural life 4 sentence. 5 And if I did not have the Merkes 6 case and Mr. Rodriguez case, I would've most likely 7 been capable of being in a medium facility. 8 Q. Okay. Now, you're saying Reynaldo 9 Guevara testified in the Baez case. 10 Was that in sentencing? 11 A. Correct, that's in sentencing. 12 Q. Okay. And that was to prove up or to 13 bring up the -- the other conviction you had 14 already in the Merkes case, correct? 15 A. Correct. 16 Q. Okay. Other than testifying that you 17 had been convicted of -- in the other murder case, 18 what else did his testimony consist of? 19 A. I believe just -- just being adamant as 20 far as, you know, he believes that we did it. 21 Q. And what -- you talked before about you 22 might have had a different kind of education or 23 different things you could have done in different 24 prisons.</p>	<p style="text-align: right;">Page 156</p> <p>1 was no programs like that. When I was in -- being 2 at the time that I was in Menard, I did not hear 3 anything like that. It was never discussed to me 4 as that. When I was in Pontiac, they had shut the 5 culinary down when I was back again the second 6 time. 7 BY MR. ENGQUIST: 8 Q. I'm sorry, which place had culinary 9 that got shut down? 10 A. Pontiac. For just a small amount of 11 time, they had culinary. 12 Q. And when did they have culinary? 13 A. They had culinary, if I'm correct, it 14 was around in 2000. But by the time with the list 15 being long and then they -- they eliminated it. 16 They don't have a culinary anymore. 17 Q. Well, did you try for it? 18 A. Yeah. I tried for it, but she says 19 that the list is kind of long, so eventually she 20 had -- they had terminated the program, I guess, 21 because IDOC felt like it should be introduced into 22 a medium security level instead of a max level. 23 Q. During the time you were at IDOC, did 24 you ever -- what's the right term for it? Did you</p>
<p style="text-align: right;">Page 155</p> <p>1 What programs did you want to get 2 into -- want to do when you were in prison that you 3 were kept from doing because of where you were 4 housed? 5 MS. HAGY: Objection; form, foundation. 6 THE WITNESS: When I was sent to Dixon, they 7 had different programs there that I couldn't 8 because I was -- my -- my time while still 9 remaining in IDOC was minimal. So the programs, 10 they needed like a year or more in order to get 11 involved in programs. So they had like creative 12 arts programs. They had different type of programs 13 that we could have gotten involved, but I couldn't. 14 BY MR. ENGQUIST: 15 Q. Besides creative arts, what other 16 programs would you have liked to have been part of? 17 MS. HAGY: Objection, form. 18 THE WITNESS: I was thinking more of like 19 maybe, if anything, like culinary. 20 BY MR. ENGQUIST: 21 Q. And the culinary training wasn't part 22 of any facilities you stayed in earlier? 23 MS. HAGY: Objection; form, foundation. 24 THE WITNESS: When I was in Stateville, there</p>	<p style="text-align: right;">Page 157</p> <p>1 ever get in trouble while you were there? Were you 2 ever get disciplined while you were there within 3 IDOC? 4 A. Yes. 5 Q. What about? 6 A. I had -- one I had -- I had books that 7 weren't supposed to be -- that I didn't have -- 8 well, that I wasn't supposed to have. I was 9 holding it for my cellmate. Another one was nail 10 clippers and I believe it was excessive soap. But 11 that's the only ones that I could recall. 12 Q. Were you ever put in segregation? 13 A. Yes. 14 Q. What for? 15 A. The nail clippers. I've been to 16 segregation, if I recall correctly, under 17 investigation for -- for -- for playing cards with 18 a police officer -- well, a corrections officer. 19 Q. Anything else? 20 A. Not that I could recall. 21 Q. And what was the -- the type of books 22 you were holding for your cellmate? 23 A. They were pornographic. And the market 24 in there, they're -- they're worth money. So they</p>

<p style="text-align: right;">Page 158</p> <p>1 could only have a certain amount of room in your 2 correspondence box that is so big and high. So he 3 had excess amount of -- you know, he was to his 4 limit. I had room in my box. So he said if I 5 could just hold it and I said okay. I didn't think 6 of any harm in it, of just holding any books. 7 MR. ENGQUIST: Okay. All right. Before I 8 make a final push here going through some stuff, I 9 was going to take a break. So we can take a good 10 ten minutes. I'll be back. 11 MS. HAGY: Thank you. 12 THE VIDEOGRAPHER: We're off the record at 13 2:51. 14 (Recess taken.) 15 THE VIDEOGRAPHER: We're back on the record. 16 The time is 3:02 p.m. 17 BY MR. ENGQUIST: 18 Q. Okay. You ready, sir? 19 A. Yes. 20 Q. Okay. All right. I know we -- we've 21 gone through your different conversations and your 22 interactions with Reynaldo Guevara, but let me make 23 sure. 24 Although you didn't speak with</p>	<p style="text-align: right;">Page 160</p> <p>1 admit that he was a member of the Dragons. 2 And he -- Olszewski continued to ask 3 us in return if we were Dragons as well, to James 4 Garcia and myself. 5 Q. Okay. Is this the first time you had 6 any contact with Officer Olszewski, or you said 7 detective, Detective Olszewski? 8 A. Yeah, detective. The other time was -- 9 I got pulled over from him. I was in the 10 intersection between Grand and Fullerton by the car 11 wash, in which he pulled me over and told me to go 12 around, don't continue going down this way, go the 13 opposite way. 14 Q. Okay. The pulling over at Grand and 15 Fullerton at a car wash, was that the first time 16 you had contact with Officer Olszewski or the 17 second time? 18 A. That was the -- actually, that was the 19 second time. 20 Q. That was the second time? 21 A. Um-hmm. 22 Q. And when was this, the pulling over by 23 the car wash? 24 A. Around in the beginning of September</p>
<p style="text-align: right;">Page 159</p> <p>1 Detective Halvorsen, did you ever see him again 2 after he drove you -- drove you to the police 3 station? 4 A. Not that I could recall. 5 Q. The other officer that was in the back 6 seat with you, did you ever see him again after you 7 were driven to the police station? 8 A. No. I don't -- I don't recall seeing 9 him ever since that day. 10 Q. Do you know who an Officer Olszewski 11 is? 12 A. Yes. 13 Q. And who is that? 14 A. He's a detective from Area 5. 15 Q. And how do you know who he is? 16 A. He had pulled us over with another 17 individual that I was with, Gary Garcia, James 18 Garcia, Amy Carrillo, and Marilyn, I believe her 19 name was. We were in a car before I was 20 incarcerated. 21 He had pulled us over on California 22 close by Diversey. He -- he had Gary in -- in the 23 back on the squad car. He was -- his partner was 24 punching him in the -- in the side to get him to</p>	<p style="text-align: right;">Page 161</p> <p>1 of '94. 2 Q. September of 1994? 3 A. Yes. 4 Q. And when he pulled you over, what kind 5 of car was he driving? 6 A. He had a Chevy, a four-door Chevy, just 7 a detective car. 8 Q. And was he by himself or with somebody? 9 A. He was with another tall gentleman. 10 The same guy that he was with when he pulled us 11 over with Gary. 12 Q. And what time of day was this? 13 A. It was -- it was in -- maybe close to 14 like, I want to say, 3:00 o'clock, 3:00 to 5:00. 15 Q. I'm sorry. You broke up. 16 You said 3:00 to what? 17 A. I want to say -- estimate like 3:00 or 18 5:00 o'clock. 19 Q. And what happened after he told you to 20 go the other way? 21 A. I -- I just obliged. I -- I got in my 22 car. He jumped in his car and I left. I went the 23 opposite way. 24 Q. Now, when you say -- just go back.</p>

<p style="text-align: right;">Page 162</p> <p>1 How did you know his name was</p> <p>2 Olszewski?</p> <p>3 A. Olszewski was pretty famous, but I -- I</p> <p>4 learned it from so many people that talked about</p> <p>5 him from him harassing people. He -- when I was in</p> <p>6 the car with Gary, Gary said that Olszewski</p> <p>7 continued to follow him previous to that same day.</p> <p>8 And that that day he pulled us over and, you know,</p> <p>9 that's when that interaction occurred when they</p> <p>10 were punching Gary in the side to get him to admit</p> <p>11 that he was a Dragon.</p> <p>12 Q. Okay. So let's go to the first time</p> <p>13 you had contact with him when you're talking about</p> <p>14 Officer Olszewski's partner was punching Gary.</p> <p>15 A. Um-hmm.</p> <p>16 Q. Okay. Did Officer Olszewski hit either</p> <p>17 Gary or James or you or Amy?</p> <p>18 A. No. Not to me, no.</p> <p>19 Q. Okay. Can you describe Officer</p> <p>20 Olszewski?</p> <p>21 A. He's -- back then a Caucasian man, at</p> <p>22 least maybe -- I want to say maybe like five foot</p> <p>23 two maybe. I don't know.</p> <p>24 The other gentleman, he was a tall</p>	<p style="text-align: right;">Page 164</p> <p>1 A. Yeah. It looked like more what you</p> <p>2 would where under a suit.</p> <p>3 Q. Okay.</p> <p>4 A. But, again, it was dark outside.</p> <p>5 Q. Okay. Was he wearing like a sport</p> <p>6 coat?</p> <p>7 A. It -- it kind of looked like he had one</p> <p>8 of them jackets, but, again, I really -- I really</p> <p>9 don't know because it was really kind of dark. He</p> <p>10 had me facing towards the car while he was patting</p> <p>11 me down. If I had to glance, he would just -- you</p> <p>12 know, told me to look forward. And when I looked</p> <p>13 to the side, to the left of me while he was looking</p> <p>14 at his partner to the right of him, he looked at</p> <p>15 me, looking at to the left, and he said, If you</p> <p>16 want to run, try it; let's see how far you get.</p> <p>17 Q. Okay. And the taller officer, the one</p> <p>18 that you said was six foot with a -- maybe a</p> <p>19 flattop, was he dressed similar to Officer</p> <p>20 Olszewski?</p> <p>21 A. No. He was dressed in black.</p> <p>22 Q. When you say "dressed in black," what</p> <p>23 do you mean?</p> <p>24 A. He had like really dark clothes. He</p>
<p style="text-align: right;">Page 163</p> <p>1 guy. He's least like six foot maybe, I want to</p> <p>2 say. Tall, skinny guy.</p> <p>3 Q. Okay.</p> <p>4 A. Looked like he had like a flattop, but</p> <p>5 I'm not sure.</p> <p>6 Q. Anything other than Olszewski being a</p> <p>7 white guy, maybe five two?</p> <p>8 A. No. That's all I could think of.</p> <p>9 Q. Okay. And how was he dressed when you</p> <p>10 first met him when you -- when you said you were</p> <p>11 pulled over with Gary and James Garcia?</p> <p>12 A. It was -- when I was with Gary, it was</p> <p>13 dark outside so -- but it looked like he had a</p> <p>14 collared shirt.</p> <p>15 Q. When you're saying "collared shirt,"</p> <p>16 are you talking like a polo, like what --</p> <p>17 A. No.</p> <p>18 Q. -- you're wearing right now or are you</p> <p>19 talking --</p> <p>20 A. No.</p> <p>21 Q. All right. I'm sorry. Let me finish.</p> <p>22 Are you talking more like a more</p> <p>23 kind of formal kind of almost like what you would</p> <p>24 wear underneath a suit?</p>	<p style="text-align: right;">Page 165</p> <p>1 didn't have nothing like a white color or anything</p> <p>2 of a -- of a light color on him.</p> <p>3 Q. Okay. Was he also wearing more of a</p> <p>4 collared shirt or something else?</p> <p>5 A. From the -- from the distance, I</p> <p>6 couldn't really tell, but it looked like he had a</p> <p>7 jacket on.</p> <p>8 Q. Okay. Gary and James Garcia, were they</p> <p>9 gang members?</p> <p>10 MS. HAGY: Objection; form, foundation.</p> <p>11 MS. BONJEAN: Join.</p> <p>12 THE WITNESS: James was I believe a Dragon.</p> <p>13 Gary, I think as -- he was as well, but I really</p> <p>14 don't know during the time if Gary got out or what.</p> <p>15 BY MR. ENGQUIST:</p> <p>16 Q. And when was this first encounter with</p> <p>17 Officer Olszewski?</p> <p>18 A. That was in 1994, I want to say, around</p> <p>19 maybe in August.</p> <p>20 Q. Beginning of August, end of August, mid</p> <p>21 August? What do -- what do you think?</p> <p>22 A. I would say around the middle to the</p> <p>23 beginning.</p> <p>24 Q. And how long was this interaction you</p>

<p style="text-align: right;">Page 166</p> <p>1 and the Garcia brothers -- I'm sorry. Are they 2 brothers? 3 A. Yes. 4 Q. The Garcia brothers, how long was the 5 interaction you guys had with Officer Olszewski and 6 his tall partner? 7 A. I would say matter of within 8 15 minutes. 9 Q. Were you ever arrested that night? 10 A. He took us to the police station. 11 Q. When you say he took you to police 12 station, how did you get to the police station? 13 A. He informed us to follow him. 14 Q. Okay. So the 15 minutes, is that 15 15 minutes on the street or 15 minutes total? 16 A. 15 minutes I would say in the street. 17 Q. Okay. And then he said he -- you were 18 to follow him to the police station? 19 A. Yes. 20 Q. Okay. And -- and, I'm sorry, were you 21 driving or was Gary or James driving? 22 A. No. That was Gary's car. Gary was 23 driving. 24 Q. And so did Gary do that; did Gary</p>	<p style="text-align: right;">Page 168</p> <p>1 looked and everything. It was more like a 2 receiving section. 3 Q. Okay. Was this on the first floor, the 4 second floor? Where was this? 5 A. I would say on the first. 6 Q. Okay. And this receiving area that 7 you're talking about, can you describe how big it 8 was? 9 A. I -- I really can't describe it. 10 it's -- it's -- it -- I know it was -- it was kind 11 of like painted white. The surrounding are all 12 white. The bench looked like it was painted white. 13 Q. And what -- 14 A. And it -- 15 Q. I'm sorry. 16 A. It looked like it was like one way in, 17 one way out. Soon as you come out of it, to the 18 left is where we -- you would take the pictures. 19 Q. Okay. When you were brought to this 20 room, was it all four of you together? 21 A. Yes. 22 Q. Okay. Were any of you handcuffed? 23 A. Yes. 24 Q. Who was handcuffed?</p>
<p style="text-align: right;">Page 167</p> <p>1 follow him to the police station? 2 A. Yes. 3 Q. And which police station was that? 4 A. I believe it was Grand and Central. 5 Q. And once you got to the police station, 6 what happened next? 7 A. They put us in some type of room. It 8 was like -- it was different than when I was 9 charged. It didn't really have bars. It was more 10 like a receiving section. They put us there. 11 They -- they sat us down and everything. And it 12 was -- he was informing some other detectives, I 13 don't know from what, but it was based on to obtain 14 pictures. 15 Q. Okay. Now, when you were brought to 16 the station, did you come -- did you go to the 17 front of the police station or the back of the 18 station? 19 A. We went through the back, if I recall 20 correct. 21 Q. When you came in through the back, 22 where did you go next? 23 A. He -- he took us into the -- to the 24 holding area where I was explaining to you how it</p>	<p style="text-align: right;">Page 169</p> <p>1 A. I was handcuffed. Jimmy was 2 handcuffed, Gary. 3 Q. What about Amy? 4 A. As far as I could recall, all of us 5 were handcuffed. 6 Q. Okay. When were you handcuffed? 7 A. As soon as we got to the station. 8 Q. Okay. How big was this receiving room? 9 A. Again, I -- I really can't explain. I 10 would say maybe a like the size of this room that 11 I'm in now. I really don't know the size of this 12 room, but it's -- it's kind of a big -- not that 13 big, but it's a -- it's a good, decent size. 14 MR. ENGQUIST: Okay. Lindsay, since I'm not 15 there, can you -- is there any way I can get an 16 idea of the size of that room? 17 MS. HAGY: Well, we could show the camera 18 around and we could measure it with our feet to 19 know the perimeter. 20 Willie, you want so go stand over 21 there so we can try to show? 22 So probably like 20 by 22. 23 MR. ENGQUIST: That -- actually, I was going 24 to say 20, but, yeah, that makes sense.</p>

<p style="text-align: right;">Page 170</p> <p>1 MS. HAGY: Sorry. I ...</p> <p>2 BY MR. ENGQUIST:</p> <p>3 Q. And besides -- you said there was a</p> <p>4 bench. Was it just one bench in the room or more</p> <p>5 than one bench?</p> <p>6 A. It looked like two, if I recall</p> <p>7 correctly.</p> <p>8 Q. Okay. Anything else in the room other</p> <p>9 than a couple benches?</p> <p>10 A. Could have been a restroom.</p> <p>11 Q. In the room?</p> <p>12 A. Yeah. It could have been a restroom,</p> <p>13 but I'm not sure.</p> <p>14 Q. Was there a toilet in the room?</p> <p>15 A. That's what I mean.</p> <p>16 Q. Okay. So how long were you waiting in</p> <p>17 this room, the four of you?</p> <p>18 A. We -- we stood there for quite some</p> <p>19 time. Maybe like 25 minutes, within.</p> <p>20 Q. And then what happened next?</p> <p>21 A. They -- he -- it looked like Olszewski</p> <p>22 was talking to some other guy. He looked --</p> <p>23 bald-headed guy. He looked towards us and then he</p> <p>24 left. I overheard one of them ask him, Why did you</p>	<p style="text-align: right;">Page 172</p> <p>1 where you would take the picture and then you</p> <p>2 advance the frame, then you take another --</p> <p>3 MS. BONJEAN: Object to the -- are you</p> <p>4 testifying or --</p> <p>5 MR. ENGQUIST: No. I'm asking if this is was</p> <p>6 it is, Jennifer. Let me --</p> <p>7 MS. BONJEAN: Okay. Ask --</p> <p>8 MR. ENGQUIST: -- ask the question.</p> <p>9 MS. BONJEAN: -- him if he knows what a --</p> <p>10 MR. ENGQUIST: No.</p> <p>11 MS. BONJEAN: -- 35 millimeter --</p> <p>12 MR. ENGQUIST: Stop.</p> <p>13 MS. BONJEAN: -- is.</p> <p>14 MR. ENGQUIST: Let me ask the question.</p> <p>15 You're not objecting. You're interpreting.</p> <p>16 MS. BONJEAN: Well, I don't like -- I do not</p> <p>17 think you're asking a fair question. It lacks</p> <p>18 foundation. Here's my objection. Carry on.</p> <p>19 MS. HAGY: Join.</p> <p>20 MR. ENGQUIST: Thank you.</p> <p>21 BY MR. ENGQUIST:</p> <p>22 Q. Sir, back to the camera.</p> <p>23 Was it the kind we were talking</p> <p>24 about, you know, back in the day before digital</p>
<p style="text-align: right;">Page 171</p> <p>1 bring them here? It sounded like he told them it</p> <p>2 was for pictures. Then they -- shortly after that,</p> <p>3 we were getting called to be taking pictures and</p> <p>4 that was it.</p> <p>5 Q. And where were the pictures taken?</p> <p>6 A. As I explained, when you come on out,</p> <p>7 to the left, there -- you would go and there's</p> <p>8 like -- I guess like a mugshot or something that</p> <p>9 were taking pictures, but there was a guy there who</p> <p>10 was just taking our pictures.</p> <p>11 Q. Okay. Now, you were processed there</p> <p>12 before too, correct? The guy took your picture</p> <p>13 when you were processed there, mugshots?</p> <p>14 A. Yeah, but this one was difference.</p> <p>15 Q. Okay. How was it different?</p> <p>16 A. It looked like he just had a regular</p> <p>17 camera compared to the other one that's -- I don't</p> <p>18 know. I want to say it looked like it was on a</p> <p>19 tripod or something, but it's -- it's more bigger</p> <p>20 than when I was being processed.</p> <p>21 Q. Okay. And when you say "regular</p> <p>22 camera," like a 35 millimeter camera?</p> <p>23 A. Something like that, yeah.</p> <p>24 Q. The one where you -- well, digital now,</p>	<p style="text-align: right;">Page 173</p> <p>1 where you would take the pictures, then you would</p> <p>2 advance the film, then take another picture and</p> <p>3 advance the film, have a roll of pictures -- roll</p> <p>4 film in it?</p> <p>5 MS. HAGY: Objection; form, foundation.</p> <p>6 THE WITNESS: It looked like the ones that</p> <p>7 they just come on out.</p> <p>8 BY MR. ENGQUIST:</p> <p>9 Q. Like an instant?</p> <p>10 A. Yes.</p> <p>11 Q. Like a Polaroid?</p> <p>12 A. Yeah.</p> <p>13 Q. And how many pictures were taken of</p> <p>14 you?</p> <p>15 MS. HAGY: Objection; form, foundation.</p> <p>16 THE WITNESS: I just know they took one of</p> <p>17 me. I believe they took pictures of Gary and</p> <p>18 James, but I really didn't ask them. They were</p> <p>19 just calling us one at a time.</p> <p>20 BY MR. ENGQUIST:</p> <p>21 Q. Did they take pictures of -- or take a</p> <p>22 picture at least of Amy?</p> <p>23 MS. HAGY: Objection; form, foundation.</p> <p>24 THE WITNESS: I really don't know if they</p>

<p style="text-align: right;">Page 174</p> <p>1 called her, to be honest, for -- for a picture or 2 questioning. 3 BY MR. ENGQUIST: 4 Q. Was this the first time you'd ever had 5 your picture taken at the police department? 6 MS. HAGY: Objection. 7 MS. BONJEAN: I'm going to object to the 8 foundation of that question. Foundation, form of 9 that question. 10 MS. HAGY: Join. 11 BY MR. ENGQUIST: 12 Q. Go ahead. 13 MS. BONJEAN: It's not a fair question. It's 14 not a fair question. There's not enough foundation 15 to answer that question. 16 BY MR. ENGQUIST: 17 Q. Okay. Go ahead, sir. 18 A. I don't -- I don't believe that was the 19 only time. As you already know, I was charged for 20 auto theft when I was a juvenile. 21 Q. Okay. And was your picture taken 22 during that time when you were charged as a 23 juvenile? 24 MS. HAGY: Objection; form, foundation.</p>	<p style="text-align: right;">Page 176</p> <p>1 extremely young. If anyone has a 17-year-old son, 2 I'm sure they would agree. 3 BY MR. ENGQUIST: 4 Q. And how long were you at the police 5 station, sir? 6 A. I would say about 25 minutes roughly. 7 Q. And what happened after that? 8 A. We were informed to -- that we could -- 9 we were being released. 10 Q. And I believe you said the next time 11 you saw the person you say is Officer Olszewski was 12 at the Grand and Fullerton car wash, correct? 13 MS. HAGY: Objection, form. 14 THE WITNESS: Yes. I was driving down 15 Fullerton passing Narraganset. I seen him on 16 Narraganset. As I continued going toward to where 17 Grand and Fullerton meet, he -- he turned right 18 behind me, hit the lights, pulled me over, informed 19 me to step out of the car. I stepped out of the 20 car. Informed me to get on the passenger side. 21 His partner was standing by his door looking at me. 22 Olszewski just asked me where am I headed to. And 23 I said, I'm -- I'm just driving to go see a friend. 24 He -- he says, No, go the other way.</p>
<p style="text-align: right;">Page 175</p> <p>1 MS. BONJEAN: His picture? 2 MR. ENGQUIST: I said picture. 3 MS. BONJEAN: Photograph or picture, 4 painting, a statue? 5 BY MR. ENGQUIST: 6 Q. Sir, you can answer the question. 7 A. I believe they took a picture, if I 8 recall correctly. 9 Q. Okay. When your picture was taken on 10 other occasions, were they ever taken with 11 Polaroids or were they always taken with a bigger 12 camera on a tripod, as you described earlier? 13 MS. HAGY: Objection; form, foundation. 14 MS. BONJEAN: And I'm going to object also. 15 There are other ways to get pictures taken, which 16 you know, at the police station. So objection. 17 THE WITNESS: To be honest, I really can't 18 recall each time of what type of camera it was from 19 when I was extremely young like that. 20 BY MR. ENGQUIST: 21 Q. Extremely young. You were 17, correct? 22 A. I'm talking about the -- to comparing 23 like from the auto theft. 24 MS. BONJEAN: And -- and 17 is young,</p>	<p style="text-align: right;">Page 177</p> <p>1 BY MR. ENGQUIST: 2 Q. Okay. Did you have any other contact 3 with him after that point? 4 A. After that point, no. 5 Q. Okay. Do you know who Kennelly Saez 6 is? 7 A. I don't know him personally, no, just 8 only on the case. 9 Q. Did you know who Jorge Rodriguez was 10 before this case? 11 A. No. 12 Q. What about Jacqueline Grande? 13 A. No. 14 Q. Amy Merkes? 15 A. No. 16 Q. Okay. Do you know who -- who Kiki is? 17 A. No. 18 Q. Okay. Roberta Rivera, does that name 19 ring a bell? 20 A. No. 21 Q. Okay. 22 MS. HAGY: I'm so sorry. Can we take a 23 really fast break? I forgot I have a doctor's 24 appointment and they keep calling me. I just need</p>

<p style="text-align: right;">Page 178</p> <p>1 to tell them -- -</p> <p>2 MR. ENGQUIST: That's fine. Then I'm going</p> <p>3 to step out too. So why don't we take a good five</p> <p>4 minutes.</p> <p>5 THE VIDEOGRAPHER: We're off the record at</p> <p>6 3:25 p.m.</p> <p>7 (Recess taken.)</p> <p>8 THE VIDEOGRAPHER: We're back on the record</p> <p>9 at 3:42 p.m.</p> <p>10 BY MR. ENGQUIST:</p> <p>11 Q. Let me show you what I'm going to mark</p> <p>12 as Exhibit Number 7. It was produced under Negron</p> <p>13 32437 through 32438.</p> <p>14 Okay. Can you see that, sir?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. I don't know if you've got a</p> <p>17 hardcopy there. I just want to kind of read</p> <p>18 through it and I want then to ask you a question</p> <p>19 about it. It's only about two pages.</p> <p>20 Do you have a hardcopy there?</p> <p>21 A. Yes.</p> <p>22 Q. Then you know what, I'll -- does</p> <p>23 everybody else have a hardcopy?</p> <p>24 MS. BONJEAN: I don't have it handy. Can you</p>	<p style="text-align: right;">Page 180</p> <p>1 believe, if I had to guess.</p> <p>2 Q. Have you ever seen this document</p> <p>3 before?</p> <p>4 A. Not that I could recall.</p> <p>5 Q. Did you ever sign a document similar to</p> <p>6 this?</p> <p>7 A. Something kind of similar, but it</p> <p>8 wasn't this.</p> <p>9 Q. And what document that was kind of</p> <p>10 similar did you sign?</p> <p>11 A. Basically it was a form that was in</p> <p>12 Pontiac, if I'm correct. They were -- it was based</p> <p>13 on renunciation for any type of gang activity, but</p> <p>14 this is definitely not my signature.</p> <p>15 Q. Okay. Sir, Gary Garcia, do you still</p> <p>16 keep in touch with him?</p> <p>17 A. No.</p> <p>18 Q. When's the last time you spoke to him?</p> <p>19 A. I spoke to him when I was in Dixon.</p> <p>20 His brother was there at Dixon with me in -- right</p> <p>21 before I was released.</p> <p>22 Q. So James was incarcerated there?</p> <p>23 A. Yes.</p> <p>24 Q. Is James still in Dixon?</p>
<p style="text-align: right;">Page 179</p> <p>1 just scroll up real quick, though, please? So I</p> <p>2 can just see what it -- I'm sorry, down, so I can</p> <p>3 see what it is.</p> <p>4 MR. ENGQUIST: Tell me when to move forward</p> <p>5 again.</p> <p>6 MS. BONJEAN: Yeah. Go ahead, go ahead, go</p> <p>7 ahead. Keep going.</p> <p>8 Okay. Thank you.</p> <p>9 MR. ENGQUIST: Sure.</p> <p>10 BY MR. ENGQUIST:</p> <p>11 Q. Okay. Sir, have you had a chance to</p> <p>12 read through it?</p> <p>13 A. I'm -- I'm in the last page.</p> <p>14 Q. Okay. Let me know when you're ready.</p> <p>15 A. You could continue.</p> <p>16 Q. Okay. This exhibit, which is 7, I</p> <p>17 believe, it's titled Affidavit of Methods. If you</p> <p>18 go to the last page, or the second page, is that</p> <p>19 your signature, sir?</p> <p>20 A. No. This is not my signature.</p> <p>21 Q. Okay. Then my question for you,</p> <p>22 because this was produced by your attorneys, do you</p> <p>23 know what this is?</p> <p>24 A. I believe it's a -- a renunciation, I</p>	<p style="text-align: right;">Page 181</p> <p>1 A. As far as I know, no.</p> <p>2 Q. I'm sorry?</p> <p>3 A. I don't -- I don't think so.</p> <p>4 Q. Do you know what James was in Dixon</p> <p>5 for?</p> <p>6 A. I just -- I believe it was a felony.</p> <p>7 Q. Do you remember what type of felony it</p> <p>8 was.</p> <p>9 A. I don't know if it was a murder or</p> <p>10 attempted murder. I don't know.</p> <p>11 Q. Back when you knew Gary and James --</p> <p>12 actually, after you were arrested in this case, did</p> <p>13 you ever have any contact with Gary and James?</p> <p>14 A. After? Just when I was in Dixon. I</p> <p>15 was also with James in Stateville.</p> <p>16 Q. Did you know if James's case involved</p> <p>17 any of the people that you're suing in your case?</p> <p>18 A. No. I wouldn't -- I wouldn't know</p> <p>19 that.</p> <p>20 Q. Okay. And when you knew James and Gary</p> <p>21 before you were incarcerated, do you remember where</p> <p>22 they lived?</p> <p>23 A. I just -- I really -- during the time</p> <p>24 before I got incarcerated, I believe they were</p>

<p style="text-align: right;">Page 182</p> <p>1 staying by -- I know it was by Fullerton. I 2 believe it was Fullerton and Kedzie. 3 Q. Do you know how old James is? 4 A. He's around the same age as me, maybe 5 younger. 6 Q. And I'm sorry. How old are you right 7 now? 8 A. 44. 9 Q. And do you know roughly how old Gary 10 is? 11 A. He could be around 45, I think, 46. 12 Q. And Amy Carrillo, have you kept in 13 contact with her at all? 14 A. No. 15 Q. When's the last time you spoke with Amy 16 Carrillo? 17 A. I haven't talked to Amy since, I 18 believe, if I recall correctly, before I was 19 incarcerated, before that day we were together in 20 the car. 21 Q. And how old would Amy Carrillo be 22 today? 23 A. Around -- I would say maybe a year 24 younger than me or the same age.</p>	<p style="text-align: right;">Page 184</p> <p>1 BY MR. ENGQUIST: 2 Q. Okay. We will mark this as Number 8. 3 If you have a -- want to have a chance just to read 4 through it. I think you have a hardcopy in front 5 of you. 6 A. Yeah. I have a hardcopy. 7 Q. Okay. I'll take it down. 8 Okay. Sir, do you know what this 9 is? 10 A. Yes. 11 Q. Okay. Did you ever get interviewed by 12 somebody from Northwestern or anyone people from 13 Northwestern regarding your case or cases? 14 A. The only closest what I've ever got 15 interviews from them is over correspondence through 16 the mail. Or if not, there was -- if possibly 17 through the phone, but majority was through the 18 mail. 19 Q. Okay. When you say "majority," did you 20 send back -- was it more than one letter you sent 21 back and forth? 22 A. I believe it was more than one, yes. 23 Q. Okay. Do you have any of that 24 correspondence?</p>
<p style="text-align: right;">Page 183</p> <p>1 Q. And do you remember where she lived 2 back in 1994? 3 A. I believe it was on Normandy. 4 Q. Okay. Did James and Gary also go to 5 the same high school as you? 6 A. No. 7 Q. Okay. Do you remember what high school 8 they went to? 9 A. I believe they went to Steinmetz. 10 Q. Okay. And what about Amy Carrillo? 11 A. I think she went the same, but I'm not 12 sure. 13 Q. Okay. I believe we're on Exhibit 14 Number 8. I'm going to show what's marked -- it 15 was produced in one of the -- the big productions 16 before, but it's under the Bloom -- a Bloom 17 heading. Bloom 42713. 18 MS. BONJEAN: Wait. You sent it earlier? 19 MR. ENGQUIST: I did. 20 MS. HAGY: You -- did you send it in a big 21 packet of things. I don't -- 22 MR. ENGQUIST: No. Just a single letter. 23 MS. HAGY: Oh, yeah. Okay. 24</p>	<p style="text-align: right;">Page 185</p> <p>1 A. I might have. To be honest, though, it 2 would be in my mother's house. 3 Q. Okay. Do you recall anything that you 4 discussed with Northwestern? 5 A. As far as with Northwestern, they -- 6 they just wanted information pertaining or anything 7 that could help out against -- well, about the 8 misconduct with Detective Guevara or anything that 9 I know about on regards to this. So I was kind of 10 in correspondence with them, but majority I believe 11 it was with Ms. Perez. 12 Q. Okay. Did Northwestern ever represent 13 you in any way? 14 A. No. 15 Q. Okay. And you said you had tele- -- 16 I'm sorry. I don't want to put words in your 17 mouth. 18 Did you have telephone conversation 19 with people from Northwestern? 20 A. That's what I mean. If I ever did, it 21 would be maybe, if anything, it could have been 22 maybe one. But to my extent of knowledge, I don't 23 even really recall. But majority, yes, I did have 24 correspondence with them.</p>

<p style="text-align: right;">Page 186</p> <p>1 Q. Okay. Do you remember any of the 2 specifics of the correspondence, other than -- I 3 know you already gave the generality of what you 4 discussed. Do you remember any specifics of what 5 you discussed with Northwestern in your 6 correspondence?</p> <p>7 A. Majority was based on like things that 8 I have discussed with you as far as like possible 9 foul play, in which I believe was foul play, 10 misconduct from Guevara. Anything that I would 11 know about, I would reveal to them. But majority 12 was because of the case at hand and having 13 knowledge of how Guevara is.</p> <p>14 Q. Did you ever discuss your other case, 15 the Baez murder case?</p> <p>16 A. No. It seemed like they were -- 17 according to the letter, it was from Area 5 18 misconduct. So the Baez case was Area 4. So it 19 seemed like they were more interested into the 20 Area 5 misconduct.</p> <p>21 Q. Okay. I believe this will be Number 8. 22 If you have them, it's Defendant Halvorsen's -- 23 it's Plaintiff's Response to Defendants Halvorsen's 24 Interrogatories.</p>	<p style="text-align: right;">Page 188</p> <p>1 MS. BONJEAN: -- to foundation. 2 Yeah, sorry. Go ahead. 3 MS. HAGY: Objection; form, foundation. 4 MS. BONJEAN: Yeah, join in that objection. 5 THE WITNESS: Should I answer? 6 MS. HAGY: If you know. 7 THE WITNESS: Based on my answer, I did not 8 have any type of proof besides the print coming 9 back negative of -- of the case. So of course I 10 contested as no because I would be still under 11 conviction and I have no other further evidence to 12 show based on innocence. 13 MR. ENGQUIST: Okay. Can I have that answer 14 read back, please? 15 (The record was read as follows: 16 Q. Based on my answer, I did 17 not have any type of proof 18 besides the print coming back 19 negative of the case. So of 20 course I contested as no 21 because I would still be under 22 conviction and I have no other 23 further evidence to show based 24 on innocence.)</p>
<p style="text-align: right;">Page 187</p> <p>1 THE COURT REPORTER: Number 9 is next. 2 MR. ENGQUIST: I'm sorry. Number 9. Thank 3 you. 4 BY MR. ENGQUIST: 5 Q. What I want to do is just move to 6 page -- page 10. 7 A. This has to be 14. This got to be 10. 8 Okay. 9 Q. Okay. And it'll be the question to 10 number 14. 11 The question was: Do you contend 12 that you're innocent of the murder of Antonio Baez? 13 If your answer is yes, please state all facts, 14 witnesses, and evidence that would support this 15 contention. 16 The response being: No. 17 Do you see that, sir? 18 A. Yes. 19 Q. Okay. Sir, earlier today you -- you 20 indicated that you did not commit the murder of 21 Antonio Baez. So I'm kind of wondering why did you 22 respond no in these interrogatories? 23 MS. BONJEAN: I'm going to object -- 24 MS. HAGY: Objection.</p>	<p style="text-align: right;">Page 189</p> <p>1 MR. ENGQUIST: Okay. Also, Ms. Hagy, 2 before -- when I was going through this, I couldn't 3 find the copy of his signature for these 4 interrogatories, for the first set of inter- 5 rogatories. If you can send that along, I'd 6 appreciate it, just so I have the final set. 7 MS. HAGY: So you're saying you -- you want 8 the final set of our interrogatories? 9 MR. ENGQUIST: No. I -- I have his signature 10 page for these second set of I think Olszewski's, 11 but when I was digging through my file I couldn't 12 find his -- his attestation for the first set of 13 interrogatories from Halvorsen, Olszewski, or 14 Mingey. So I want to make sure I have those just 15 because I didn't -- I didn't see them in here and 16 they were done a couple years ago, so I just want 17 to make sure. 18 MS. HAGY: Okay. 19 MR. ENGQUIST: If you can forward those over 20 just so I can put them in my file, I'd appreciate 21 it. 22 MS. HAGY: Okay. 23 MR. ENGQUIST: Thanks. 24</p>

<p style="text-align: right;">Page 190</p> <p>1 BY MR. ENGQUIST:</p> <p>2 Q. And, sir, before you answered question</p> <p>3 number 14, did you review it?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Sir, do you know a Dr. James</p> <p>6 Garbarino?</p> <p>7 MS. HAGY: Objection; form, foundation.</p> <p>8 BY MR. ENGQUIST:</p> <p>9 Q. It's G-a-r-b-a-r-i-n-o.</p> <p>10 A. I think so. It was -- it was based</p> <p>11 on -- if I'm correct, it was based on the</p> <p>12 sentencing for -- under a murder claim for Antonio</p> <p>13 Baez.</p> <p>14 Q. Okay. And do you remember speaking to</p> <p>15 this doctor?</p> <p>16 A. Yes. We had problems at first from</p> <p>17 him coming in at first to come and conduct the</p> <p>18 interview. I don't know if it was something</p> <p>19 going on I guess with the IDOC or some type of</p> <p>20 communication, but we eventually got in</p> <p>21 communication.</p> <p>22 Q. Okay. And how many times did you meet</p> <p>23 with him?</p> <p>24 A. If I'm correct, it was just one.</p>	<p style="text-align: right;">Page 192</p> <p>1 MS. HAGY: Objection --</p> <p>2 MR. ENGQUIST: Yes.</p> <p>3 MS. HAGY: -- foundation.</p> <p>4 THE WITNESS: He just tapped me on the head.</p> <p>5 My cousins and I were fighting. He just tapped me</p> <p>6 in the head. He didn't really give a hard blow.</p> <p>7 BY MR. ENGQUIST:</p> <p>8 Q. Was it more of a playful tap?</p> <p>9 A. Yeah.</p> <p>10 Q. Okay. If -- so wouldn't characterize</p> <p>11 it as being physically assaulted?</p> <p>12 A. No.</p> <p>13 Q. Okay. What about being punched with a</p> <p>14 fist by your uncle?</p> <p>15 A. That was -- yeah. He had broke my</p> <p>16 tooth when I was young.</p> <p>17 Q. How young?</p> <p>18 A. I was around within 7 -- 6 or 7 years</p> <p>19 old.</p> <p>20 Q. And do you know how that -- I know this</p> <p>21 is a long time ago because you were 6 or 7 years</p> <p>22 old.</p> <p>23 Do you have memory of what</p> <p>24 precipitated this being struck with a fist by your</p>
<p style="text-align: right;">Page 191</p> <p>1 Q. Okay. And how long was your meeting?</p> <p>2 A. I don't know. I want to say within</p> <p>3 30 minutes.</p> <p>4 Q. And do you remember what you discussed?</p> <p>5 A. Based on -- it was just talking about</p> <p>6 like in general life, as far as -- if I recall</p> <p>7 correctly.</p> <p>8 MR. ENGQUIST: All right. I know we just</p> <p>9 took a break, but I'm just going to take another</p> <p>10 break to make sure I don't have anything else to</p> <p>11 cover. And if I don't, I'll pass the torch on to</p> <p>12 somebody else. Okay? I just need five minutes.</p> <p>13 THE VIDEOGRAPHER: We're off the record at</p> <p>14 4:01 p.m.</p> <p>15 (Recess taken.)</p> <p>16 THE VIDEOGRAPHER: We're back on the record.</p> <p>17 Time is 4:09 p.m.</p> <p>18 BY MR. ENGQUIST:</p> <p>19 Q. Okay. I just want to ask you about a</p> <p>20 couple things that show up in a report here just to</p> <p>21 see if it's correct.</p> <p>22 Is it true that you were physically</p> <p>23 assaulted by your grandfather with a hammer?</p> <p>24 A. When I was young?</p>	<p style="text-align: right;">Page 193</p> <p>1 uncle?</p> <p>2 MS. HAGY: Objection; form, foundation, and I</p> <p>3 really don't see the relevance of this or how like</p> <p>4 a 6 year old could know the causation.</p> <p>5 MS. BONJEAN: Join.</p> <p>6 BY MR. ENGQUIST:</p> <p>7 Q. Go ahead, sir.</p> <p>8 A. If I recall correctly, it was because I</p> <p>9 had called him a bastard. I had snuck out of the</p> <p>10 house to go get some candy. I had some change on</p> <p>11 me. They were like one cents per candy back then.</p> <p>12 So I snuck out of the house and he caught me with</p> <p>13 my brother. And he had his graduation ring and he</p> <p>14 just tapped me on the mouth, but the graduation</p> <p>15 ring chipped a tooth.</p> <p>16 Q. Okay.</p> <p>17 A. But he didn't punch me.</p> <p>18 Q. Did not punch you?</p> <p>19 A. Yes.</p> <p>20 Q. Just to be clear, you've never engaged</p> <p>21 in substance abuse, correct?</p> <p>22 A. Just in the programs that I -- I</p> <p>23 explained to you.</p> <p>24 Q. Yeah. I understand you said you went</p>

<p style="text-align: right;">Page 194</p> <p>1 to the programs, but I just want to be clear: You</p> <p>2 never engaged in abusing substances?</p> <p>3 A. No.</p> <p>4 MS. HAGY: Objection; form, foundation.</p> <p>5 BY MR. ENGQUIST:</p> <p>6 Q. Have you ever attempted suicide?</p> <p>7 MS. HAGY: Objection; form, foundation,</p> <p>8 scope, relevancy.</p> <p>9 THE WITNESS: No.</p> <p>10 MS. BONJEAN: Join.</p> <p>11 BY MR. ENGQUIST:</p> <p>12 Q. Okay. Would you describe the area</p> <p>13 where you grew up to be a war zone?</p> <p>14 MS. HAGY: Objection; form, foundation.</p> <p>15 THE WITNESS: It was kind of a little crazy</p> <p>16 at times. As far as a war zone, I guess it could</p> <p>17 be described as that. It was -- back then it was a</p> <p>18 lot of shootings around the area.</p> <p>19 BY MR. ENGQUIST:</p> <p>20 Q. Okay. Were you ever witness to anyone</p> <p>21 being shot?</p> <p>22 A. As far as I recall, it was just an</p> <p>23 incident with a particular vehicle, but I didn't</p> <p>24 see anybody's face.</p>	<p style="text-align: right;">Page 196</p> <p>1 times.</p> <p>2 Q. Okay. And when were the other times?</p> <p>3 MS. HAGY: Objection; form, foundation,</p> <p>4 relevancy.</p> <p>5 THE WITNESS: The other time was on -- by</p> <p>6 Fairfield close by Chicago. And another time was</p> <p>7 in -- I believe it was on Fairfield and Augusta.</p> <p>8 BY MR. ENGQUIST:</p> <p>9 Q. And Fairfield and Chicago, what year</p> <p>10 was that?</p> <p>11 A. Fairfield and Chicago was in 1993.</p> <p>12 Q. And Fairfield and Augusta, when was</p> <p>13 that?</p> <p>14 A. That was in 19 -- I believe it was the</p> <p>15 same year.</p> <p>16 Q. '93?</p> <p>17 A. Yes.</p> <p>18 Q. On either of those occasions, was</p> <p>19 anyone injured?</p> <p>20 A. No.</p> <p>21 Q. Earlier when we were taking about</p> <p>22 firearms, you mentioned maybe a baseball bat. I</p> <p>23 don't want to take anything out of context there,</p> <p>24 but were you involved in any physical altercations</p>
<p style="text-align: right;">Page 195</p> <p>1 Q. And when was this incident?</p> <p>2 A. That was in roughly around beginning of</p> <p>3 '94, around I would say March, April.</p> <p>4 Q. And you said there was a vehicle. Can</p> <p>5 you describe what occurred?</p> <p>6 A. It was a black van. It drove down</p> <p>7 through Augusta, stopped in front of us across the</p> <p>8 street. I looked. I couldn't see who it was. I</p> <p>9 thought he was asking for something. And I was</p> <p>10 like, Who's that? He didn't do anything.</p> <p>11 Another individual that was behind</p> <p>12 me, he was maybe like 12 feet away, and he just hid</p> <p>13 behind the garbage cans. And that's when the guy</p> <p>14 started shooting, so I just ran, yeah.</p> <p>15 Q. Was anybody injured during that time?</p> <p>16 A. No.</p> <p>17 Q. Okay. Was that the only time you were</p> <p>18 ever shot at?</p> <p>19 MS. HAGY: Objection; form, foundation.</p> <p>20 THE WITNESS: No. It wasn't the only time.</p> <p>21 BY MR. ENGQUIST:</p> <p>22 Q. And how many other occasions were you</p> <p>23 shot at?</p> <p>24 A. I would estimate like three, three</p>	<p style="text-align: right;">Page 197</p> <p>1 with other gang members?</p> <p>2 A. Just we -- I've gotten into arguments</p> <p>3 before when I was young. I had -- on Division and</p> <p>4 California, I got into it with some other guy. I</p> <p>5 don't know. He was -- I didn't know the guy. He</p> <p>6 recognized me as being from a different gang, so</p> <p>7 him and I, we got into an argument.</p> <p>8 Q. And when was that?</p> <p>9 A. That was in 1992, I believe.</p> <p>10 Q. When you say you "got into an</p> <p>11 argument," did it ever get physical?</p> <p>12 A. Not with him, but his friend. His</p> <p>13 friend decided to try to come from behind me.</p> <p>14 Q. Okay. And what happened with that</p> <p>15 altercation?</p> <p>16 A. The guy, he just stood there. As far</p> <p>17 as the other guy he tried to jump on me. And I</p> <p>18 ducked and he kind of like went over me. I guess</p> <p>19 he tried to tackle me or something. So I just ran</p> <p>20 behind him and I just pushed him and he just slid</p> <p>21 on the floor. I just --</p> <p>22 Q. Anything else -- I'm sorry.</p> <p>23 A. I had left after that.</p> <p>24 Q. Okay. Any other physical altercations</p>

<p style="text-align: right;">Page 198</p> <p>1 other than this pushing this person down with</p> <p>2 another gang -- with I guess a rival gang member?</p> <p>3 MS. HAGY: Objection, form.</p> <p>4 THE WITNESS: No. That's -- that's about it.</p> <p>5 MR. ENGQUIST: Okay. All right. I don't</p> <p>6 think I have anything else at this time. I can</p> <p>7 pass the torch to somebody else if anybody else has</p> <p>8 questions.</p> <p>9 MS. CARNEY: The City doesn't have any</p> <p>10 questions.</p> <p>11 MS. McGRATH: Nothing at this time for</p> <p>12 Guevara.</p> <p>13 MR. ENGQUIST: Jennifer?</p> <p>14 MS. BONJEAN: I just have a couple of</p> <p>15 questions.</p> <p>16 EXAMINATION</p> <p>17 BY MS. BONJEAN:</p> <p>18 Q. Mr. Negron, you testified earlier about</p> <p>19 when Detectives Guevara, Halvorsen, and another</p> <p>20 detective, who I think you thought maybe was</p> <p>21 someone named Polinski or something of that nature;</p> <p>22 is that right?</p> <p>23 A. Correct.</p> <p>24 Q. You're pretty confident it was Guevara</p>	<p style="text-align: right;">Page 200</p> <p>1 Detective Halvorsen talking to each other?</p> <p>2 A. No. He was on the phone talking to my</p> <p>3 mother. He had a big -- this thing went off</p> <p>4 again -- he had a big phone like the old ones and</p> <p>5 he was busy talking to my mother on the way. And I</p> <p>6 just heard him say, Sara, we got him, don't worry</p> <p>7 about it.</p> <p>8 Q. Okay. And he -- he was trying to</p> <p>9 reassure your mother; is that correct?</p> <p>10 A. I believe so.</p> <p>11 This thing is going in and out.</p> <p>12 I -- I believe so, he was trying to</p> <p>13 reassure her that -- that he has me.</p> <p>14 Q. And did he do that with an earshot,</p> <p>15 like could -- he was in the front seat with</p> <p>16 Detective Halvorsen; is that right?</p> <p>17 A. Correct.</p> <p>18 Q. Okay. And you were where in the car,</p> <p>19 in the back seat?</p> <p>20 A. I was directly behind him.</p> <p>21 Q. Okay. So you -- you were able to hear</p> <p>22 him?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And Detective Halvorsen was</p>
<p style="text-align: right;">Page 199</p> <p>1 and Halvorsen who picked you up when they arrested</p> <p>2 you, right?</p> <p>3 A. A hundred percent.</p> <p>4 Q. Okay. And that's when they brought you</p> <p>5 back to Grand and Central, Area 5. And you</p> <p>6 interacted with Guevara primarily at Area 5; is</p> <p>7 that right?</p> <p>8 A. Correct.</p> <p>9 Q. I think you testified that once at Area</p> <p>10 5, that Detective Guevara told you, Don't talk to</p> <p>11 the state's attorney; just talk to me. Is that</p> <p>12 what you were saying?</p> <p>13 A. Correct.</p> <p>14 Q. Okay. So it wasn't that he was telling</p> <p>15 you not to talk. He was telling you not to talk to</p> <p>16 the state's attorney, but to talk to him. Is that</p> <p>17 fair?</p> <p>18 A. I would say fair, yeah.</p> <p>19 Q. Okay. And he -- he did, in fact, ask</p> <p>20 you questions and talked to you while you were at</p> <p>21 Area 5; is that right?</p> <p>22 A. Correct.</p> <p>23 Q. Now, on the car ride there to Grand and</p> <p>24 Central, did you hear Detective Guevara and</p>	<p style="text-align: right;">Page 201</p> <p>1 sitting next to him; is that right?</p> <p>2 A. Correct.</p> <p>3 Q. Okay. So presumably Detective</p> <p>4 Halvorsen would have been hearing the same thing</p> <p>5 you were hearing; is that correct?</p> <p>6 MR. ENGQUIST: Objection, foundation.</p> <p>7 THE WITNESS: Correct.</p> <p>8 BY MS. BONJEAN:</p> <p>9 Q. Okay. And at any point did you hear</p> <p>10 Detective Halvorsen say, You know what, Rey, you</p> <p>11 know, this is inappropriate, we're not -- we're not</p> <p>12 going to be putting a case on this kid; did you</p> <p>13 hear him say anything like that?</p> <p>14 A. No.</p> <p>15 MR. ENGQUIST: Objection; leading.</p> <p>16 BY MS. BONJEAN:</p> <p>17 Q. Okay. Did you --</p> <p>18 MR. ENGQUIST: Argumentative.</p> <p>19 BY MS. BONJEAN:</p> <p>20 Q. Did you hear Detective Halvorsen say</p> <p>21 absolutely anything that suggested that he was</p> <p>22 uncomfortable with the tactics that were being used</p> <p>23 by Detective Guevara?</p> <p>24 MR. ENGQUIST: Objection, argumentative.</p>

<p style="text-align: right;">Page 202</p> <p>1 THE WITNESS: No. I didn't hear him object 2 to anything pertaining to Guevara tactics of how he 3 handled the case. 4 BY MS. BONJEAN: 5 Q. Okay. One other thing. You talked 6 about conversations with what -- and I'm not sure I 7 got this right, but this is a -- either a son or a 8 stepson of Guevara's? 9 A. Yeah. Tony. 10 Q. Okay. Tony. That's right. 11 And is this a stepson? 12 A. It's a stepson, yes. 13 Q. Okay. And it sounds like you had a 14 number of conversations with Tony and then also 15 with Tony's mother, right? 16 A. Yes. 17 Q. Okay. What -- how did -- how did 18 Detective Guevara treat his stepchildren? 19 A. He was -- 20 MS. McGRATH: Objection, form. 21 THE WITNESS: They were kind of like scared 22 of him. That also made me uncomfortable in seeing 23 how uncomfortable they are, especially living with 24 him. And his -- her other big daughter, Marcy, as</p>	<p style="text-align: right;">Page 204</p> <p>1 violence against him? 2 MS. McGRATH: Objection, form. 3 THE WITNESS: No. The only -- the only thing 4 I've ever heard was just based on conversations 5 from my mother based on how he -- other allegations 6 pertaining to, like you described, of whatever is 7 going on between him and his other women that he 8 ever had with. 9 BY MS. BONJEAN: 10 Q. Okay. All right. And one other kind 11 of area I wanted to touch on. 12 You testified about how you 13 essentially called out Detective Guevara for being 14 a corrupt police officer prior to your arrest; is 15 that fair? 16 A. Yes. 17 MS. McGRATH: Objection, form. 18 MR. ENGQUIST: Yeah. Argumentative. 19 BY MS. BONJEAN: 20 Q. And as a young kid, a teenager, you did 21 this in part to the neighbors who lived right next 22 door to Guevara; is that right? 23 A. Correct. 24 MS. McGRATH: Objection to form.</p>
<p style="text-align: right;">Page 203</p> <p>1 far as not wanting to live with her -- with them. 2 And also how he was like trying to seclude me away 3 from Dominic, which is his biological son. 4 BY MS. BONJEAN: 5 Q. So do you know how old Dominic was when 6 you had your interactions with Guevara prior to 7 your arrest? 8 A. I would say roughly maybe like 12, 13. 9 Q. Okay. And you're saying Detective 10 Guevara was the one who kind of tried to keep you 11 separated from Dominic? 12 A. Yes. 13 MS. McGRATH: Objection; form, calls for 14 speculation. 15 BY MS. BONJEAN: 16 Q. All right. Do you know how many 17 children in total Reynaldo Guevara had back in '94, 18 I -- you know, I guess? 19 A. I've heard that he has quite a bit. 20 I -- as far as a number, I really don't know, 21 to be honest. 22 Q. All right. And do you know whether or 23 not any of Detective Guevara's wives and/or 24 girlfriend's have made accusations of domestic</p>	<p style="text-align: right;">Page 205</p> <p>1 BY MS. BONJEAN: 2 Q. Okay. And is that because the 3 neighbors were there and that was the closest 4 adults other than, you know, maybe Guevara's family 5 that you could tell this to? 6 A. Correct. I knew, like I said, the ones 7 on the right, they had some Mexicans that were 8 there, and what I heard, pertaining to the 9 conversations with Mary and my mother, that he got 10 rid of them. So the only one that was still 11 available was this man. Yes, correct. He was the 12 only adult that I could think of that was so close 13 that I could run to. 14 Q. Okay. Now, did I get this right, that 15 Detective Guevara said, Listen, if you have a 16 complaint with me, you can tell my sergeant, right? 17 MS. McGRATH: Objection, form. 18 THE WITNESS: Correct. 19 BY MS. BONJEAN: 20 Q. And did he tell you or suggest to you 21 that you should try to talk to either Sergeant 22 Biebel or Sergeant Mingey? 23 A. Correct. 24 Q. Okay. And did you get the impression</p>

<p style="text-align: right;">Page 206</p> <p>1 that if you told your complaint to Sergeant Mingey, 2 that they would have taken that complaint 3 seriously? 4 MR. ENGQUIST: Objection, leading. 5 THE WITNESS: I don't think that it would 6 have been taken seriously. I think that it would 7 have been taken as a joke. These are friends of 8 his. 9 Based on his -- what I've witnessed 10 from him saying in 1991 of the African-American man 11 stating that where would it go even if he would 12 have put a complaint. So I knew that regardless of 13 my complaint, it would have been going to deaf 14 ears. 15 BY MS. BONJEAN: 16 Q. When you overheard that conversation 17 that Detective Guevara was having about the 18 African-American man that had made a complaint 19 against him, did it sound as if Guevara was taking 20 the complaint very seriously? 21 MS. McGRATH: Objection, form. 22 THE WITNESS: No. He -- he actually laughed 23 about it and he just stated that like -- he just 24 made the comment, quote, Like it's going do go</p>	<p style="text-align: right;">Page 208</p> <p>1 MS. BONJEAN: All right. I have nothing 2 further for Mr. Negron. Thank you. 3 MS. HAGY: Okay. I do have a few questions. 4 EXAMINATION 5 BY MS. HAGY: 6 Q. When you talked about how you had this 7 confrontation with Guevara and he said you better 8 hope I don't get this case. 9 A. Yes. 10 Q. Did you know what he meant by that? 11 MS. McGRATH: Objection, form. 12 THE WITNESS: I took it as it was like sort 13 of like a threat. That once he gets it, he's -- 14 he's got his own twist to it. Since Almodovar's 15 name as his description pertaining to the phone 16 conversation, that he was going to definitely go 17 after Mr. Almodovar. So somehow since I was 18 showing a total friendship and defending 19 Mr. Almodovar, that I was automatically tied to 20 whatever happened to Mr. Almodovar was going to 21 happen to me. 22 BY MS. HAGY: 23 Q. And did he say anything about how he 24 would get the case?</p>
<p style="text-align: right;">Page 207</p> <p>1 anywhere. 2 BY MS. BONJEAN: 3 Q. And, by the way, did he say 4 African-American or did he use another name for the 5 African-American man? 6 A. He used -- 7 MS. McGRATH: Objection, leading. 8 THE WITNESS: He used another name. And 9 that's what also caused like more of an alarm and 10 of a red flag, in resemblance to their kids and, 11 you know, them living under him and everything. 12 But he used Black. 13 BY MS. BONJEAN: 14 Q. Okay. And you're saying that some of 15 his children or stepchildren were -- were darker 16 complected than him? 17 A. Just Marcy and Myra are kind of like on 18 the darker side. Tony is more of a lighter 19 complexion, but their father is, biological, 20 African-American. 21 Q. I see. 22 So the stepfather of his 23 stepchildren is an African-American man? 24 A. Yes.</p>	<p style="text-align: right;">Page 209</p> <p>1 A. He always said like -- well, he stated 2 that he could always talk to Mingey or Biebel. 3 Q. Talk to them in order to get a case? 4 A. In order to basically take hands of -- 5 control of the case and have the case. 6 MS. HAGY: And then I have a couple of 7 documents responding to some of the questions that 8 I -- they are from the IDOC file. 9 So, counsel, can I give you the 10 Bates stamps for these documents or do you want me 11 to send you a PDF? 12 MR. ENGQUIST: Well, you're going to have to 13 send a PDF later on if you're going to want it 14 attached. But why don't you give them to us and 15 just give me a second so I can pull it up. 16 MS. HAGY: Okay. So I'd like to look at the 17 IDOC -- sorry. Just trying to figure out which way 18 this goes here. 19 IDOC Master File 192 to 193. 20 MR. ENGQUIST: And where was that produced? 21 What's the Bates? 22 MS. HAGY: Sorry. That's -- you know what, 23 let's not -- 24 MR. ENGQUIST: Because I don't have master</p>

<p style="text-align: right;">Page 210</p> <p>1 file IDOC production. I have -- I have a mass of 2 stuff in your production, which isn't labeled that 3 way. 4 Is there a Negron Bates stamp on it? 5 MS. HAGY: There is not, but that's okay. 6 Let's -- let's not worry about it. 7 MR. ENGQUIST: Well, I -- 8 MS. BONJEAN: Didn't you guys subpoena that? 9 MR. ENGQUIST: No. We were never able to get 10 that. If you have the master file, I thought we 11 would be -- we have bits and pieces of IDOC records 12 within the Negron production. I can't remember 13 exactly where. But if you have something there 14 that's from the master file that's there, you 15 probably should have that produced. 16 MS. HAGY: Okay. Let me check that. I 17 thought that we had produced that, but I did, you 18 know, come into the case after things have been 19 produced. So I will -- I'll sort that out. 20 MR. ENGQUIST: I mean, it could be, because 21 what's happened before, it's hard o tell where the 22 documents came from in your productions because 23 they're not labeled. So it could be in there. If 24 they're -- if they are in there, just let us know</p>	<p style="text-align: right;">Page 212</p> <p>1 BY MS. HAGY: 2 Q. And were you aware whether having a 3 sentence of natural life affected your security 4 status in prison? 5 MR. ENGQUIST: Objection; calls for 6 speculation, foundation. 7 THE WITNESS: Yes. My -- based on the staff, 8 my -- my security level when I first come in, it's 9 automatically high. There's four levels of 10 identifications that we receive. It's from an ID 11 from the having a white, which is extremely low 12 security, blue is moderate, red is high, and green 13 is extremely high, which is -- majority it's for 14 escapes or individuals who received an additional 15 case while incarcerated. 16 I was given a red. My security 17 level was at high due to the sentence that I was 18 received. 19 MS. HAGY: Okay. All right. That's all my 20 questions. 21 MR. ENGQUIST: Okay. I kind of want to go 22 back to something. 23 24</p>
<p style="text-align: right;">Page 211</p> <p>1 what Bates numbers you're talking about. If they 2 aren't in there, could you please produce what you 3 have for the master file? 4 MS. HAGY: Yes, I will. 5 So we won't worry about that. 6 BY MS. HAGY: 7 Q. So when -- when you were at Pontiac, 8 you did sign affidavit of status renouncing any 9 gang affiliation, correct? 10 A. Correct. 11 Q. And do you know, when you were asked 12 about how your sentences affected the security 13 level that you were assigned to at prison, did 14 you -- well, first of all, would you have not 15 gotten natural life if it had not been for the 16 prior conviction? 17 MR. ENGQUIST: Objection; calls for 18 speculation, foundation. 19 THE WITNESS: What I was -- what I witnessed, 20 yes, I was facing no more than, if anything, 21 90 years, and I was under 50 percent, and that 22 would have been the max. But most likely I would 23 have been getting lenient sentence because it was 24 based on a first adult conviction.</p>	<p style="text-align: right;">Page 213</p> <p>1 FURTHER EXAMINATION 2 BY MR. ENGQUIST: 3 Q. You were just asked some questions by 4 Ms. Bonjean having to do with the car ride. I just 5 want to be clear about Detective Halvorsen. 6 You said you saw Detective Halvorsen 7 when you were pulled over by Detective Guevara, 8 correct? 9 A. Yes. 10 Q. Halvorsen was driving the vehicle, 11 correct? 12 A. Yes. 13 Q. Okay. He never spoke to you, correct? 14 A. No. 15 Q. Okay. You never spoke to Detective 16 Halvorsen, correct? 17 A. No. 18 Q. And from the what you saw, the only -- 19 only actions that Detective Guevara did in front of 20 Detective Halvorsen was when you were around. Was 21 that -- he got -- he stopped you and put you in the 22 car. He got on the phone with your mom to let you 23 know -- let her know that it was going to be okay, 24 that he was taking you into the -- in custody,</p>

<p style="text-align: right;">Page 214</p> <p>1 correct?</p> <p>2 A. Correct.</p> <p>3 MS. HAGY: Objection, leading.</p> <p>4 BY MR. ENGQUIST:</p> <p>5 Q. And then walked you into the police</p> <p>6 station; is that right?</p> <p>7 A. To be explicit, little bit more detail.</p> <p>8 When he pulled me over, Halvorsen was directly</p> <p>9 right behind me of the vehicle, pointing his gun</p> <p>10 towards my head. His -- the other individual was</p> <p>11 in the passenger side pointing his gun towards me.</p> <p>12 I turned around with my hands still on the steering</p> <p>13 wheel and I looked over my left shoulder and I seen</p> <p>14 Guevara standing on the passenger side of the squad</p> <p>15 car that they were in.</p> <p>16 I informed Guevara as showing of</p> <p>17 acknowledge that I know him and I said, What's</p> <p>18 going on, Rey? And Guevara said, That's -- That's</p> <p>19 him, get him out of the car. And that's when I got</p> <p>20 out of the car. And he said, Come towards me. The</p> <p>21 other two detectives searched the car. They backed</p> <p>22 up the car into a corner, almost on top of the</p> <p>23 sidewalk. Mr. Guevara -- I asked Mr. Guevara</p> <p>24 during the time when all this was happening, What</p>	<p style="text-align: right;">Page 216</p> <p>1 just him and I, like I said, in the -- in the</p> <p>2 interrogation room.</p> <p>3 MR. ENGQUIST: Okay. I have nothing further.</p> <p>4 MS. BONJEAN: I just have a couple questions</p> <p>5 based on that.</p> <p>6 FURTHER EXAMINATION</p> <p>7 BY MS. BONJEAN:</p> <p>8 Q. Mr. Negron, do you have any knowledge</p> <p>9 about what Mr. Guevara and Mr. Halvorsen may have</p> <p>10 spoken about before you were arrested?</p> <p>11 A. No.</p> <p>12 Q. Okay. And do you know who wrote the</p> <p>13 police reports that allegedly reported the</p> <p>14 investigative actions that were taken in the case</p> <p>15 that ultimately resulted in your wrongful</p> <p>16 conviction?</p> <p>17 A. If I had to assume, it would have to be</p> <p>18 Guevara, but I really don't know.</p> <p>19 Q. Right. You don't know who actually sat</p> <p>20 at the typewriter and wrote up those reports, do</p> <p>21 you?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. And I'm assuming you weren't</p> <p>24 privy to any meetings that might have taken place</p>
<p style="text-align: right;">Page 215</p> <p>1 is this about? And he said, This has to do with</p> <p>2 your mother. And it's like he didn't want to go</p> <p>3 into any detail during the time. That's when the</p> <p>4 individuals were walking back. He put the cuffs on</p> <p>5 me; put me in the car.</p> <p>6 Q. So I just want to be clear, the things</p> <p>7 that Mr. Halvorsen -- or Detective Halvorsen was</p> <p>8 around for when talking about actions by Detective</p> <p>9 Guevara, okay, that you were around for too, is</p> <p>10 that he was there when you were pulled over, like</p> <p>11 you described, correct?</p> <p>12 A. Yes.</p> <p>13 Q. He was there when you were put in the</p> <p>14 car, put - placed into custody and put in the car</p> <p>15 by Guevara, correct?</p> <p>16 A. Correct.</p> <p>17 Q. And he was there when Guevara was on</p> <p>18 the phone with your mom, right?</p> <p>19 A. Correct.</p> <p>20 Q. But he wasn't there for anything after</p> <p>21 that point, after you got inside the police</p> <p>22 station; is that right?</p> <p>23 MS. HAGY: Objection; form, foundation.</p> <p>24 THE WITNESS: As far as I recall, no. It was</p>	<p style="text-align: right;">Page 217</p> <p>1 between Detective Guevara and Detective Halvorsen</p> <p>2 at any point during also the investigation, right?</p> <p>3 A. Correct.</p> <p>4 Q. And that would be true of Sergeant</p> <p>5 Minge as well. Do you have any knowledge about</p> <p>6 whether -- personal knowledge about whether or not</p> <p>7 Guevara may have spoken do Detective -- or Sergeant</p> <p>8 Minge prior to your arrest?</p> <p>9 A. No. I don't have any knowledge of</p> <p>10 that.</p> <p>11 Q. Okay. Did Detective -- did Detective</p> <p>12 Guevara share with you all the ways in which he was</p> <p>13 going to carry out his -- his wrongful arrest and</p> <p>14 prosecution of you and Mr. Almodovar?</p> <p>15 MR. ENGQUIST: Objection.</p> <p>16 MS. McGRATH: Form.</p> <p>17 MR. ENGQUIST: Form, argumentative, leading.</p> <p>18 THE WITNESS: It was based on 1994. That's</p> <p>19 how I took it. When he stated that I better not</p> <p>20 get this case, it was more towards leading toward</p> <p>21 Mr. Almodovar of -- of going after Mr. Almodovar.</p> <p>22 In defending Mr. Almodovar, I was automatically</p> <p>23 tied.</p> <p>24 Beyond that, whatever conversations</p>

<p style="text-align: right;">Page 218</p> <p>1 happened with the individuals of Mingey, Biebel, 2 Halvorsen, or whoever else, I really don't know as 3 to why all of this was occurring as to us getting 4 wrongfully convicted. 5 MS. HAGY: All right. I have nothing 6 further. Thank you. 7 MR. ENGQUIST: I have nothing based off that. 8 Anybody else? 9 MS. McGRATH: Nothing based on that. 10 MR. ENGQUIST: All right. Waive or reserve, 11 Lindsay? 12 MS. HAGY: The court reporter has been 13 writing this all down. And then you can either 14 look at the transcript and make like small changes, 15 like really like name corrections; or we can waive 16 and trust that she worked really hard and we 17 don't -- we just don't sign it. 18 THE WITNESS: Depends on you. 19 MS. HAGY: I'd waive. 20 THE WITNESS: Okay. 21 MS. HAGY: Do you want to say waived? 22 THE WITNESS: Yeah. 23 MS. HAGY: Okay. We're going to waive. 24 THE VIDEOGRAPHER: This concludes the</p>	<p style="text-align: right;">Page 220</p> <p>1 2 REPORTER'S CERTIFICATE 3 I, Kathleen A. Hillgard, do hereby certify 4 that WILLIAM NEGRON was duly sworn to testify the 5 whole truth, that the foregoing deposition was 6 recorded stenographically by us and was reduced to 7 computerized transcript under my direction, and 8 that said deposition constitutes a true record of 9 the testimony given by said witness. 10 11 I further certify that the reading and 12 signing of the deposition was waived by the 13 deponent. 14 15 I further certify that I am not a relative or 16 employee or attorney or counsel of any of the 17 parties, or a relative or employee of such attorney 18 or counsel, or financially interested directly or 19 indirectly in this action. 20 21 IN WITNESS WHEREOF, I have hereunto set my 22 hand of office at Chicago, Illinois, this 12th day 23 of October 2021. 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209 210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 238 239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259 260 261 262 263 264 265 266 267 268 269 270 271 272 273 274 275 276 277 278 279 280 281 282 283 284 285 286 287 288 289 290 291 292 293 294 295 296 297 298 299 300 301 302 303 304 305 306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 321 322 323 324 325 326 327 328 329 330 331 332 333 334 335 336 337 338 339 340 341 342 343 344 345 346 347 348 349 350 351 352 353 354 355 356 357 358 359 360 361 362 363 364 365 366 367 368 369 370 371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524 525 526 527 528 529 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 588 589 590 591 592 593 594 595 596 597 598 599 600 601 602 603 604 605 606 607 608 609 610 611 612 613 614 615 616 617 618 619 620 621 622 623 624 625 626 627 628 629 630 631 632 633 634 635 636 637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656 657 658 659 660 661 662 663 664 665 666 667 668 669 670 671 672 673 674 675 676 677 678 679 680 681 682 683 684 685 686 687 688 689 690 691 692 693 694 695 696 697 698 699 700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 740 741 742 743 744 745 746 747 748 749 750 751 752 753 754 755 756 757 758 759 760 761 762 763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797 798 799 800 801 802 803 804 805 806 807 808 809 810 811 812 813 814 815 816 817 818 819 820 821 822 823 824 825 826 827 828 829 830 831 832 833 834 835 836 837 838 839 840 841 842 843 844 845 846 847 848 849 850 851 852 853 854 855 856 857 858 859 860 861 862 863 864 865 866 867 868 869 870 871 872 873 874 875 876 877 878 879 880 881 882 883 884 885 886 887 888 889 890 891 892 893 894 895 896 897 898 899 900 901 902 903 904 905 906 907 908 909 910 911 912 913 914 915 916 917 918 919 920 921 922 923 924 925 926 927 928 929 930 931 932 933 934 935 936 937 938 939 940 941 942 943 944 945 946 947 948 949 950 951 952 953 954 955 956 957 958 959 960 961 962 963 964 965 966 967 968 969 970 971 972 973 974 975 976 977 978 979 980 981 982 983 984 985 986 987 988 989 990 991 992 993 994 995 996 997 998 999 1000</p>
<p style="text-align: right;">Page 219</p> <p>1 deposition. We're off the record at 4:40 p.m. 2 (The proceedings adjourned at 3 4:42 p.m.) 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>	

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